EPA REGISTRATION 67690-16 VOLUME 4



SePRO Corporation • 11550 North Meridian Street • Suite 600 • Carmel, Indiana 46032-4565 *Phone:* (317) 580-8282 Fax: (317) 428-4577

November 22, 2010

Kelly Ballard
Risk Management and Implementation Branch 2
Office of Pesticide Programs (7508P)
Document Processing Desk (DCI/PRD)
U.S. Environmental Protection Agency
2775 South Crystal Drive
Arlington, VA 22202

Subject:

90-Day Data Call-In Response for Flurprimidol (125701)

Dear Ms. Ballard:

SePRO Corporation (11550 North Meridian Street, Suite 600, Carmel, IN 46032, EPA Company Number 67690) is submitting a response to the product-specific Data Call-In notice (DCI) for the active ingredient flurprimidol, dated September 1, 2010. Please find enclosed the following information in support of the 90-Day Data Call-In response:

- · Cover letter;
- Application for Registration (EPA Form 8570-1);
- · Data Call-In Response Form; and
- Requirements Status and Registrant's Response

If you have any questions or need additional information, please do not hesitate to contact me at (317) 216-8280.

Sincerely,

Tyler Koschnick

Director, Research and Regulatory Affairs

Enclosures

SEPA Environmental Protection Agenc				псу		×	Registration Amendment Other		OPP Identi	lier Number
		Applicatio	n for f	Pestici	de - Sect	ion	i			
1. Company/Product Number 67690	ı	-		2. EPA	Product Men	PĞ0;		1, ,	seatClassoque	Hication
4. Company/Product (Name)	·			PM#	#EC			- [<u>*</u>]	None	Restricted
SePRO Corporation / Flurprin				20	_ _ / .		· ——			
5. Name and Address of App SePRO Corporation 11550 N. Meridian St. Carmel, IN 46032-456	., Suite 600	del		6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name						
			Sec	tion - l						
Amendment - Explain below. Resubmission in response to Agency letter dated. Notification - Explain below. Explanation: Use additional page(s) if necessary. (For section) a				x otion II.)	Final printed Agency lotte "Mo Too" A Other - Expl	er dat oplica	ation,			
Submission of 90-da	ay Data Cali-In	Response		ion - 1	11		·			···
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3. Location of Net Contente I	nformation ontainer	4. Siza(s) Reta	nii Contair	ner		5, Lo	cetion of Label (Direction	ns .	
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Tyler Koschnick, Ph	1.D.		Nov	emb	er 22,	20	010	1		

United States Environmental Protection OMB Approval 2070-0107 OMB Approval 2070-0174 OMB Approval 2070-0057 Agency Washington, D.C. 20460 DATA CALL-IN RESPONSE INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary. 2. Case # and Name 3. Date and Type of DCI and Number 1 Company Name and Address SEPRO CORP 01-Sep-2010 11550 N MERIDIAN ST SUITE 600 Chemical # and Name 125701 GENERIC Flurprimidol CARMEL, IN 46032 ID# RR-125701-30036 6. Generic Data 7. Product Specific Data 4. EPA 5 I wish to Product cancel this Registration product regis-6b | lagree to satisfy Generic 7b. My product is an EUP and 6a. I am claiming a Generic 7a. My product is an MUP and tration volun-Data Exemption because I Data requirements as indicated Lagree to satisfy the MUP I agree to satisfy the EUP tarily obtain the active ingredient on the attached form entitled requirements on the attached requirements on the attached from the source EPA regisform entitled "Requirements form entitled "Requirements "Requirements Status and tration number listed below. Registrant's Response." Status and Registrant's Status and Registrant's Response.* Response." 67690-16 N.A. N.A. Yes 8. Certification II certify that the statements made on this form and all attachments are true, accurate, and complete II acknowledge that any 9 Date knowingly faise or misleading statement may be punishable by fine, impresonment or both under applicable law. Director, Research 11/22/10 and Regulatory Affairs Signature and Title of Company's Authorized Representative 10. Name of Company SePRO Corporation 11. Phone Number (317) 216-8580

United States Environmental Protection Agency Washington, D.C. 20460

OMB Approval 2070-0174

OMB Approval 2070-0107 OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary

Signature and Title of Company's Authorized Representative

12 Name of Company

SePRO Corporation

Company Name and Address SEPRO CORP 11550 N MERIDIAN ST SUITE 600 CARMEL, IN 46032		2 Case # and Name	2 Case # and Name Chemical # and Name 125701 Flurprimidol					Date and Type of DCI and Number 01-Sep-2010		
								GENERIC ID # RR-125701-3		
4. Guideline 5 Study Title Requirement Number			P R O T O C		rogre		6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registran Response
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835.6100	Terrestrial field dissipation	(1)					U, I, K, C	TEP	24	1.
835 6200	Aquatic field dissipation	(2)					U, I, K, C	TEP	24	1.
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850 5400	Algal toxicity, Tiers 1 and II	(3)	$\ \cdot \ $				U, I, K, C	TEP or TGAI	12	1.
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830 7050	UV/VIsible absorption					-	U, I, K, C	TGAI/PAI	8	1.
	Toxicology Data Requirements (Co	onventional Chemical)								
870 3465	90-day inhalation toxicity	(4 ,5)					U, I, K, C	TGAI	24	1.
870.6200	Neurotoxicity screening battery	(6)					U, I, K, C	TGAI	8	1.
870 7800	Immunotoxicity						U, I, K, C	TGAI	12	1,
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10 Certification 1 c	certify that the statements made on this form sleading statement may be punishable by fine	and all attachments are true, a	ccura	ite, a	and o	ome	plete. I acknowledge Director, Resea	rch 1		
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13. Phone Number (317) 216-8280

MATERIAL TO BE ADDED TO JACKET

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

James B. Messina, Agent for SePRO Corporation c/o Exponent Suite 1100 1150 Connecticut Avenue, NW Washington, DC 20036

SUBJECT: Label Amendment Cutless Technical

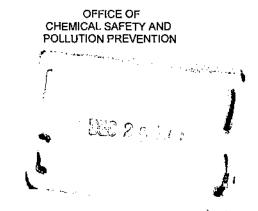
> EPA Reg. No. 67690-16; Decision # 398756 Your Submission Dated December 16, 2009

Dear Mr. Messina:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided you submit the following data to the Agency by the due date:

- Guideline 870.3465 90-day inhalation toxicity (28 day duration) due September 1, 2012
- Guideline 870.6200 Neurotoxicity screening battery due May 1, 2011
- Guideline 870.7800 Immunotoxicity due September 1, 2011

You must submit a copy of the final printed label. A stamped copy of the label is enclosed for your records. This label supersedes all previously accepted labels. If these conditions are not complied with, the registration will be subject to cancellation in accordance



with FIFRA. Your release for shipment of the product constitutes acceptance of these conditions. If you have any questions regarding this correspondence, contact Rose Kearns of my staff by phone at 703-305-5611 or via email at kearns.rosemary@epa.gov or Shaja Joyner at 703-308-3194 or via email at joyner.shaja@epa.gov.

Sincerely,

CAG Mes-Parker
Cynthia Giles-Parker

Branch Chief

Fungicide Branch

Registration Division (7504P)

Enclosure

Cutless* Technical EPA Reg. No. 67690-16

Registration Notes: Label amendment submitting in conjunction with the May 6, 2008 Occupational and Residential Exposure and Risk Assessment on Flurprimidol.

Label Notes:

General Label changes:

- 1. In the ingredients statement, changed the word "inert" to "other".
- 2. In the First Aid table, in the "If swallowed" section, added the word "immediately "to the first bullet so it reads "Call a poison control center or doctor immediately for treatement advice."
- 3. Added the sentence "In case of emergency endangering health or the environment involving this product, call **INFOTRAC** at **1-800-535-5053**" to the bottom of the First Aid table.
- 4. Updated the non-crop uses for this manufacturing use product
- 5. Updated the Warranty statements.



Cutless* Technical

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FOR MANUFACTURING USE ONLY

Active Ingredient		67690-16
flurprimidol: α -(1-methylethyl)- α -[4-(trifluoromethorough)- α -[4-(tr		99.3%
Other Ingredients		
TOTAL	•••••••	100.0%
EPA Reg. No. 67690-16 FPL021810	EPA Est. No SPC	

SePRO Corporation 11550 N. Meridian St., Ste. 600, Carmel, IN 46032 U.S.A.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

Keep Out of Reach of Children CAUTION / PRECAUCIÓN

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand this label, find someone to explain it to you in detail).

Causes Eye Irritation. Harmful If Swallowed. Avoid contact with eyes, skin, or clothing. Wear long-sleeved shirt and long pants and shoes plus socks when handling this product. Wash thoroughly with soap and water after handling.

	FIRSTAID
If in eyes	 Hold eye open and rinse slowly and gently with water for 15 - 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
	Call poison control center or doctor for treatment advice.
If swallowed	 Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow.
	Do not induce vomiting unless told to do so by a poison control center or doctor.
	Do not give anything by mouth to an unconscious person.
Have the produ	uct container or label with you when calling a poison control center or doctor, or

going for treatment. In case of emergency endangering health or the environment involving this product, call INFOTRAC at 1-800-535-5053.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge

Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For Manufacturing Use Only

This product may be used for formulation of EPA-accepted, end-use products for the following non-crop uses:

- Turfgrasses on golf courses and in residential and non-occupational settings (i.e.
 residential turf, athletic fields, schools, parks, recreational facilities, commercial buildings,
 municipal sites or other similar settings), applied by a professional applicator or
 homeowner.
- Established trees and ornamental plants in an outdoor landscape setting, applied by a professional applicator or homeowner.
- Established ornamental trees in utility rights-of-way, urban environments, residential areas
 and interior plantscapes (such as those in domestic landscape/garden areas, public display
 plantings, recreation areas, highway and other transportation rights-of-way, scenic
 corridors, storage areas, forest areas, campgrounds, and other uncultivated,
 nonagricultural areas).
- Container or field grown annual or perennial ornamental plants (e.g. bedding, plug, bulb/fibrous root crops, flowering/foliage, herbaceous/woody) in nurseries, greenhouses, shadehouses or similar structures by a professional applicator.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage: Store in a cool dry place. Store in original container only. In case of spill, contain material and dispose of as waste.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Nonrefillable Container Disposal (non-rigid, any size): Do not reuse or refill this container. Completely empty container by shaking or tapping sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Dispose of liner and container in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. Offer for recycling if available.

TERMS AND CONDITIONS OF USE

If terms of the following Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. Otherwise, to the extent consistent with applicable law, use by the buyer or any other user constitutes acceptance of the terms under Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies.

WARRANTY DISCLAIMER

SePRO Corporation warrants that the product conforms to the chemical description on the

label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, SEPRO CORPORATION MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

INHERENT RISKS OF USE

It is impossible to eliminate all risks associated with use of this product. Plant injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label such as unfavorable temperatures, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of SePRO Corporation or the seller. To the extent consistent with applicable law, all such risks shall be assumed by buyer.

LIMITATION OF REMEDIES

To the extent consistent with applicable law, the exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories) shall be limited to, at SePRO Corporation's election, one of the following:

- (1) Refund of purchase price paid by buyer or user for product bought, or
- (2) Replacement of amount of product used.

To the extent consistent with applicable law, SePRO Corporation shall not be liable for losses or damages resulting from handling or use of this product unless SePRO Corporation is promptly notified of such losses or damages in writing. In no case shall SePRO Corporation be liable for consequential or incidental damages or losses.

The terms of the *Warranty Disclaimer*, *Inherent Risks of Use* and this *Limitation of Remedies* cannot be varied by any written or verbal statements or agreements. No employee or sales agent of SePRO Corporation or the seller is authorized to vary or exceed the terms of the *Warranty Disclaimer* or *Limitations of Remedies* in any manner.

Plant Growth Regulator	Net contents
© Copyright SePRO Corporation	

E^xponent

Exponent 1150 Connecticut Avenue, NW Suite 1100 Washington, DC 20036

telephone 202-772-4900 facsimile 202-772-4979 www.exponent.com

December 10, 2010

Shaja Brothers-Joyner
Document Processing Desk
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Subject:

-Submission of Support-Documents

Dear Ms. Brothers-Joyner:

On behalf of our client, SePRO Corporation (SePRO, EPA Company Number 67690), Exponent is responding to EPA's request to submit updated data matrix and Certification with Respect to Citation of Data (EPA Form 8570-34) forms to support the following pending flurprimidol actions:

- Decision # D398756, EPA Reg. No. 67690-16 Cutless Technical
- Decision # D398765, EPA Reg. No. 67690-15 Cutless 50W Turf Plant Growth Regulator
- Decision # D398766, EPA Reg. No. 67690-13 Cutless 0.33G Landscape Growth Regulator
- Decision # D398767, EPA Reg. No. 67690-19 Turf Fertilizer Contains Cutless 0.5%
- Decision # D398768, EPA Reg. No. 67690-44 Turf Fertilizer Contains Cutless 0.17%
- Decision # D398769, EPA Reg. No. 67690-46 SP5075 Turf Growth Regulator

Please find enclosed updated data matrix and 8570-34 forms for each of the above-referenced pending actions.

If you have any questions, please contact me at 202-772-4932.

Sincerely,

James B. Messina

Authorized Representative of

SePRO Corporation

Enclosures

cc: Tyler Koschnick, SePRO



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

NOV 10 2010

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

MEMORANDUM

FROM:

SUBJECT: Posting EPA-HQ-OPP-2009-0798 Regulations.gov for Public Access

TO: Office of Pesticide Brogram's Docket

2 / 22/10

Director, Registration Division

This memorandum authorizes the posting of EPA-HQ-OPP-2009-0798 to Regulations.gov for public access.

The Agency is proposing to grant new uses of the registered active ingredient, flurprimidol, formulated as a technical product and multiple end-use products. The proposed new uses for flurprimidol are for edging/banding (liquid and granular formulations) applications to turf grass and ornamentals in commercial, municipal, and residential settings. Flurprimidol is currently registered for use on ornamental plants grown in containers in commercial greenhouses and shade houses and for use on golf course turf. There are no food uses approved for flurprimidol.

These documents will be open for public comment from November 10, 2010 to December 10, 2010.

- A. Proposed Registration of Flurprimidol on Turf Grass and Ornamentals in Residential and Non-Occupational Settings
- B. Turf Fertilizer-Contains Cutless 0.17% proposed product proposed label
- C. SP5075 Turf Growth Regulator product proposed label
- D. Turf Fertilizer-Contains Cutless 0.5% product proposed label
- E. Cutless 50W Turf Growth Regulator product proposed label
- F. Cutless 0.33G Plant Growth Regulator Fungicide product proposed label
- G. Revised Section 3 Environmental Fate and Ecological Risk Assessment of Flurprimidol Proposed for New Uses on Turf Grasses and Ornamentals

- H. Occupational and Residential Exposure/Risk Assessment of Flurprimidol for Section 3 Registration of New Uses in Residential and Non-Occupational Settings
- I. Addendum to the 10/12/2009 Occupational and Residential Exposure/Risk Assessment of Flurprimidol for Section 3 Registration of New Uses in Residential and Non-Occupational Settings

Submit your comments, identified by Docket ID No. EPA-HQ-OPP-2009-0798, by one of the following methods: www.regulations.gov: Follow the on-line instructions for submitting comments.

EPA's policy is that all comments received will be included in the public docket without change and may be made available online at http://www.regulations.gov, including any personal information provided, unless the comment includes information claimed to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Do not submit information that you consider to be CBI or otherwise protected through http://www.regulations.gov or e-mail. The http://www.regulations.gov Web site is an "anonymous access" system, which means EPA will not know your identity or contact information unless you provide it in the body of your comment. If you send an e-mail comment directly to EPA without going through http://www.regulations.gov, your e-mail address will be automatically captured and included as part of the comment that is placed in the public docket and made available on the Internet. If you submit an electronic comment, EPA recommends that you include your name and other contact information in the body of your comment and with any disk or CD-ROM you submit. If EPA cannot read your comment due to technical difficulties and cannot contact you for clarification, EPA may not be able to consider your comment. Electronic files should avoid the use of special characters, avoid any form of encryption, and be free of any defects or viruses. For additional information about EPA's public docket, visit the EPA Docket Center homepage at http://www.epa.gov/epahoine/dockets.htm.

Should you have any questions regarding this memorandum, please contact Rose Kearns at (703) 305-5611, or via email at kearns.rosemary@epa.gov.



Proposed Registration of Flurprimidol on Turf Grass and Ornamentals in Residential and Non-Occupational Settings

November 2, 2010
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division

Proposed Registration of Flurprimidol on Turf Grass and Ornamentals in Residential and Non-occupational Settings

Approved by: Sois Rossi

Lois Rossi, Director Registration Division

Date: <u>Movember 2, 2010</u>

REGULATORY PROPOSAL

The Agency is proposing to grant new uses of the registered active ingredient, flurprimidol, formulated as a technical product and multiple end-use products. The proposed new uses for flurprimidol are for edging/banding (liquid and granular formulations) applications to turf grass and ornamentals in commercial, municipal, and residential settings. Flurprimidol is currently registered for use on ornamental plants grown in containers in commercial greenhouses and shade houses and for use on golf course turf. There are no food uses approved for flurprimidol.

I. CHEMICAL INFORMATION

Chemical Name: Flurprimidol; alpha-(1-methylethyl)-alpha-[4-(trifluoromethyoxy) phenyl]-5-pyrimidinemethanol

EPA PC Code: 125701

Chemical Abstracts Service (CAS) Number: 56425-91-3

Mode of Action: Flurprimidol is a plant growth regulator and reduces internode elongation of plants through the inhibition of gibberellin biosynthesis.

Registrant: Sepro Corp

Amended Products: The Agency is proposing to grant new uses of flurprimidol for the following registered products: EPA Reg. 67690-16 (Cutless Technical), EPA Reg. 67690-13 (Cutless 0.33G Landscape Growth Regulator), EPA Reg. 67690-15 (Cutless 50W Turf Growth Regulator), EPA Reg. 67690-19 (Turf Fertilizer-Contains Cutless 0.375%), EPA Reg. 67690-44 (Turf Fertilizer-Contains Cutless 0.17%), and EPA Reg. 67690-46 (SP5075 Turf Growth Regulator).

Proposed maximum single application rates range from 0.69 to 1.5 lbs. ai/acre and proposed maximum annual application rates are 3.0 lbs. ai/acre/year.

II. HUMAN HEALTH RISK

EPA evaluated the potential human health risk for exposures to flurprimidol through use on turf grass and ornamentals in commercial, municipal, and residential settings. A summary of the human health effects and risk of flurprimidol as assessed in the Agency document entitled "Flurprimidol: Occupational and Residential Exposure/Risk Assessment of Flurprimidol for Section 3 Registration of New Uses in Residential and Non-Occupational Settings" is provided below.

The Agency uses the term Margin of Exposure (MOE) to refer to the risk associated with the exposure estimate. The MOE is defined as: the dose, typically the No Observed Adverse Effects Level (NOAEL), divided by the estimated amount of human exposure. For example, an MOE of

100 means that the estimated level of human exposure is 100 times lower than the highest tested dose that produced no adverse effects in the relevant toxicology study. The greater the MOE, the lower potential for risk to humans from exposures.

The toxicology database is considered adequate and well-characterized for selecting toxicity endpoints for risk assessment. Flurprimidol has low acute toxicity, category III or IV, via all routes of exposure. It is slightly irritating to the skin (category IV), moderately irritating to the eye (category III), and is not a dermal sensitizer.

The liver and adrenal gland are the major target organs. In the rat, microscopic changes were observed in the liver following chronic exposure but not subchronic exposure. In the dog, microscopic changes and reduced size were observed in the adrenal gland following subchronic and chronic exposure. There was no evidence of increased susceptibility in developmental toxicity studies or in the rat two-generation reproductive toxicity study. In a rat developmental toxicity study, skeletal anomalies, hydronephrosis, hydroureter, and microphthalmia were observed at a dose which also caused maternal toxicity. No developmental toxicity was observed in the rabbit study at the dose that caused maternal effects. In the two-generation rat reproductive toxicity study, decreased pup survival and weights were observed at maternally toxic doses. There is no evidence that flurprimidol is neurotoxic, and the Agency classified flurprimidol as "Not likely to be a human carcinogen". The immune system does not appear to be a target. The endpoints selected for exposure scenarios are protective of potential endocrine and developmental effects.

A. Toxicological Endpoints

- 1. Acute and Chronic Dietary: Dietary assessments were not required because there are no food/feed uses for flurprimidol.
- 2. Short-Term Incidental Oral, Dermal and Inhalation: The endpoint (i.e., toxic effect) and dose for risk assessment were selected from a rat developmental toxicity study. The endpoint was based on decreased maternal body-weight gain and food intake observed at the LOAEL (Lowest Observed Adverse Effect Level) of 45 mg/kg/day. Selection of the endpoint and dose (a NOAEL of 10 mg/kg/day) is protective of both maternal and developmental toxicity, since maternal and developmental effects were observed at the same doses.
- 3. Intermediate-Term Incidental Oral, Dermal and Inhalation: The endpoint and dose were selected from a 90-day dog study. The endpoint was based on adrenal histopathology and decreased adrenal weight and size, observed at the LOAEL of 30 mg/kg/day. The dose was the NOAEL of 1.5 mg/kg/day, and was the lowest dose available for the relevant routes and durations of exposure.
- 4. Cancer: EPA has classified flurprimidol as "Not likely to be carcinogenic to humans." based on lack of evidence of increased tumors in rat and mice. Flurprimidol showed no evidence of genotoxicity.
- 5. Route-to-route Extrapolation: Since the dermal and inhalation endpoints and doses were

selected from oral studies, the Agency assumed a 6% dermal absorption rate and a 100% inhalation absorption rate, relative to oral absorption.

6. Uncertainty Factors and the Level of Concern (LOC): No uncertainty factors (UFs) were needed to account for missing data or the lack of a NOAEL, therefore a combined uncertainty factor of 100X was based on intraspecies variability (differences between individuals) and interspecies extrapolation (differences between humans and test animals). The combined UF of 100 serves as the basis for the LOC for occupational and residential risk. Therefore, MOEs greater than the LOC of 100 are not of concern.

B. FQPA

An assessment of FQPA hazard considerations was not required because there are no food/feed uses for flurprimidol.

C. Occupational Exposure and Risk

- 1. Handlers: Except for the intermediate-term MOE for mixing/loading liquid for ground-boom applications, all other MOEs for occupational handlers performing are greater than 100 assuming baseline clothing (i.e., single layer, no gloves), and therefore are not of concern. The short-term MOEs ranged from 170 to 16,000; where as intermediate-term MOEs ranged from 110 to 3,300. The intermediate-term MOE for mixing/loading liquids for ground-boom application was 29 assuming baseline PPE; however, the MOE increased to 2,000 at the single layer plus gloves level of mitigation. Therefore, the Agency has no concern for occupational handlers provided they wear gloves.
- 2. Postapplication: Based on the proposed use pattern, occupational workers will be exposed to flurprimidol when they enter treated areas to conduct maintenance activities, such as irrigation, weeding, and mowing. Except for the intermediate-term MOE for course maintenance, all other MOEs for postapplication are greater than 100, and therefore are below the Agency's level of concern. The MOEs ranged from approximately 440 to 3,000. Although the intermediate-term MOE for golf course maintenance was 66, the Agency dose not consider this to be a risk of concern because the assessment assumed zero-day residues for a duration of 1 to 6 months, which is a significant overestimate of exposure.

D. Residential Exposure and Risk

- 1. Handlers: One of the proposed amended labels allows use by homeowners. As a result, a residential handler exposure and risk assessment was conducted. The MOEs for residential handlers applying flurprimidol ranged from 1,200 to 20,000, and therefore do not exceed the Agency's level of concern.
- 2. Postapplication: All postapplication MOEs for adults and children exposed to flurprimidol after application to turf were greater than the LOC of 100, and are therefore not of concern. The MOEs ranged from approximately 130 to 130,000.

E. Aggregate (Food + Water) Risk

There are no food/feed uses for flurprimidol. Based on the current use pattern, an aggregate exposure risk assessment was not required.

III. ENVIRONMENTAL RISK

EPA evaluated the potential ecological fate and risk for exposures to non-target organisms from the proposed flurprimidol uses. A summary of the environmental fate and ecological effects and risk of flurprimidol as assessed in the Agency document entitled "Section 3 Environmental Fate and Ecological Risk Assessment of Flurprimidol Proposed for New Uses on Turf Grasses and Ornamentals" is provided below.

A. Environmental Fate

Flurprimidol is stable to hydrolysis and resistant to degradation. In addition, flurprimidol is highly mobile in soil, is of moderate solubility in sterile water, and has a low potential for bioaccumulation.

- 1. Persistence: Flurprimidol is stable to hydrolysis and resistant to degradation in both aerobic and anaerobic terrestrial environments and is assumed to be similarly persistent in most aerobic and anaerobic aquatic environments. The half-life of flurprimidol in soil incubated under aerobic conditions was estimated to be 482 days. The aqueous photolysis half-life of flurprimidol is 1.4 days, and thus the compound is expected to degrade in clear shallow surface waters.
- 2. Transport: Flurprimidol is highly mobile in soil as indicated by the Freundlich K_d values ranging from 0.12 to 4.9 and the Freundlich K_{oc} ranging from 140 to 535.
- 3. Bioaccumulation: Based on the relatively low Log K_{ow} of 2.96, and low bioconcentration factors (BCF) ranging from 6.2x to 52.3x in a fish bioaccumulation study, flurprimidol is not expected to bioaccumulate.

To address concerns with the potential leaching of flurprimidol that may result from the persistence and mobility described above, the Agency proposes to require labels to have surface and ground water advisories that stress the potential of runoff after treatment and descriptions of conditions that may promote leaching to groundwater. Proposed label language is described more fully under "Proposed Regulatory Decision" below.

B. Ecological Risk

Ecological risk characterization integrates the results of the exposure and ecotoxicity data to evaluate the likelihood of adverse ecological effects. The means of integrating the results of exposure and ecotoxicity data is called the quotient method. For this method, risk quotients (RQs) are calculated by dividing exposure estimates by ecotoxicity values, both acute and chronic (RQ = Exposure/Toxicity). RQs are then compared to EPA's Level of Concern (LOC). The LOCs are criteria used by the Agency to indicate potential risk to non-target organisms. The

criteria indicate whether a pesticide, when used as directed, has the potential to cause adverse effects to non-target organisms.

The ecotoxicity endpoints derived from the results of short-term laboratory studies that assess acute effects are: (1) LC₅₀ (Lethal Concentration at which 50% of treated organisms die, fish and birds); (2) LD₅₀ (Lethal Dose at which 50% of treated organisms die, birds and mammals); (3) EC₅₀ (Environmental Concentration at which 50% of treated organisms die, aquatic plants and aquatic invertebrates) and; (4) EC₂₅ (Environmental Concentration at which 25% of treated organisms die, terrestrial plants). The endpoints derived from the results of long-term laboratory studies that assess chronic effects are the NOAEL and Lowest Observed Adverse Effect Level (LOAEL) for birds and mammals and No Observed Adverse Effect Concentration (NOAEC) and the Lowest Observed Adverse Effect Concentration (LOAEC) for fish and aquatic invertebrates. Risk presumptions along with the corresponding RQs and LOCs are shown in the table below.

Risk Presumptions for Non-target Organisms

Risk Presumption	RQ	LOC
Terrestrial Animals		•
Acute High Risk	EEC*/LC50 or LD50/sqft or LD50/day	≥0.5
Acute Restricted Use	EEC/LC50 or LD50/sqft or LD50/day (or LD50 < 50 mg/kg)	≥0.2
Acute Endangered Species	EEC/LC50 or LD50/sqft or LD50/day	≥0.1
Chronic Risk	EEC/NOAEL	≥1
Aquatic Animals		
Acute High Risk	EEC/LC50 or EC50	≥0.5
Acute Restricted Use	EEC/LC50 or EC50	≥0.1
Acute Endangered Species	EEC/LC50 or EC50	≥0.05
Chronic Risk	EEC/NOAEC	≥1
Terrestrial and Semi-Aquatic P	lants	
Acute High Risk	EEC/EC25	≥1
Acute Endangered Species	EEC/EC50 or NOAEC	≥1
Aquatic Plants		
Acute High Risk	EEC/EC50	≥1
Acute Endangered Species	EEC/EC50 or NOAEC	≥1

*EEC = Estimated environmental concentration

The calculated risk quotients represent a screening level assessment. Screening level assessments are based on conservative assumptions. For example, screening level assessments always assume the maximum labeled rate, the maximum number of applications, and the shortest

treatment interval between applications are always used. Screening level terrestrial risk assessments also assume that an organism is in the treated area or in adjacent areas receiving or ingesting pesticide at a rate commensurate with the treatment rate. This assumption leads to a maximum level of estimated exposure. To the extent that an organism does not reside and forage exclusively and permanently in treated areas, exposure will be less.

1. Risks to Aquatic Animals and Plants

<u>Freshwater Fish</u>: Minimal acute and chronic risks are expected for freshwater fish because no acute or chronic LOCs are exceeded. The acute risk quotients for turf grass and ornamentals were calculated to be <0.01, while the chronic risk quotients were calculated to be 0.13.

<u>Freshwater Invertebrates</u>: Minimal acute and chronic risks are expected for freshwater invertebrates because no acute or chronic LOCs are exceeded. The acute risk quotients for turf grass and ornamentals were calculated to be <0.01, while the chronic risk quotients were calculated to be 0.04.

<u>Estuarine/Marine Fish</u>: No ecotoxicity studies on estuarine/marine fish were available, therefore a quantitative estimation of risk cannot be conducted. However, it is unlikely that they would be sufficiently more sensitive than their freshwater counterparts such that Agency LOCs would be exceeded.

<u>Estuarine/Marine Invertebrates</u>: No ecotoxicity studies on estuarine/marine invertebrates were available, therefore a quantitative estimation of risk cannot be conducted. However, it is unlikely that they would be sufficiently more sensitive than their freshwater counterparts such that Agency LOCs would be exceeded.

Aquatic Plants: Using a Tier I exposure model, which is non-specific to crop and use-site, it was determined that risk is expected for aquatic vascular plants. The risk quotients ranged from 1.4 to 16. Minimal risk is expected for non-vascular plants, as LOCs were not exceeded. Using a Tier II exposure model, risk quotients ranged from 1.76 to 8.42 for aquatic vascular plants.

2. Risks to Terrestrial Animals and Plants

<u>Birds</u>: Acute toxicity data for birds when flurprimidol is applied as a banded spray to foliar surfaces suggests that flurprimidol is practically non-toxic to birds. In addition, risk is expected to be minimal for birds foraging on flurprimidol granules.

The Agency does not have a standard methodology for assessing chronic risk to birds from banding/edging applications. However, the Agency modeled the chronic risk to birds for the original application that included liquid broadcast applications (this proposed application method was later withdrawn). When assuming the maximum exposure scenario (0.75 lb ai/A applied four times with a 2-week reapplication interval), the LOC is exceeded with a chronic risk quotient of 1.6. Although there is an exceedance of the chronic LOC the potential risk for adverse effects to growth and reproduction is based on the assumption that birds occupy the area permanently and are feeding on short grass exclusively within the treated areas where turfgrasses

are grown. To the extent that those birds do not reside permanently within the treated area, exposure will be less and risk is presumably less. In addition there were no LOC exceedances when using mean EECs. The risks to birds from banding/edging applications will be less compared to the risks from the modeled broadcast applications because the likelihood of a bird coming into contact with a treated area from a banding/edging application will be lower than a treated area from a broadcast application.

Mammals:

Acute Toxicity; Banded Spray to Ground Surfaces

Acute toxicity data indicate that mammals of all weight classes may be at risk for adverse effects to survival from acute exposure to flurprimidol as a result of banded spray applications to ground surfaces. The risk quotients ranged from 0.1 to 0.31.

Acute Toxicity; Banded Granular Application to Ground Surfaces

Acute toxicity data indicate that small- and medium-sized mammals may be at risk for adverse effects to survival from acute exposure to flurprimidol as a result of granular applications. The RQs ranged from 0.03 to 0.67.

Chronic Toxicity

Chronic risks to mammals from banded/edging applications were not estimated due to model limitations. The Agency modeled the chronic risk to mammals for the original application that included liquid broadcast applications (this proposed application method was later withdrawn). Assuming one of two exposure scenarios (0.75 lb ai/acre, 4 applications with 2-week intervals and 0.26 lb ai/acre, 12 applications with 2-week intervals) LOCs were exceeded for all weight classes for short grass, tall grass and broadleaf/small insects. The risk quotients ranged from 6.76 to 29.60 for short grass, 3.10 to 13.57 for tall grass, and 3.80 to 16.65 for broadleaf plants/small insects.

The following chronic exposure estimation and risk characterization (broadcast application) for mammals considers granular routes of exposure including direct ingestion of soil invertebrates that have bio-concentrated flurprimidol residues of granules in the soil. Based on the highest EEC of flurprimidol in earthworm tissue and the lowest mammalian NOAEC, the chronic LOC is not exceeded and is 2860 times lower than the modeled EEC for insectivorous mammals exposed to flurprimidol granules via ingestion of earthworms at the highest application rate.

Exposure to mammals from banded/edging applications will be lower than modeled broadcast applications; therefore risk will be presumably less.

Amphibians and Reptiles:

The Agency currently uses surrogate avian data to assess acute and chronic risk to terrestrial-phase amphibians and reptiles. Risk to terrestrial-phase amphibians and reptiles are similar to

birds.

Beneficial Insects (Honey Bees): Available terrestrial insect toxicity data, based on tests with honey bees, suggest that flurprimidol is practically non-toxic to bees on an acute contact basis. The LD_{50} value was >100 µg ai/bee. Risk to beneficial insects in the direct treatment area exposed to flurprimidol is expected to be minimal.

<u>Soil-dwelling Invertebrates (Earthworms)</u>: Available acute toxicity data indicate flurprimidol is practically non-toxic to soil-dwelling invertebrates on an acute basis. The LD_{50} value was >100 μg ai/kg. Risk is expected to be minimal for soil-dwelling invertebrates burrowing soils with flurprimidol residues.

<u>Terrestrial Plants:</u> Available terrestrial plant toxicity data indicate that monocots and dicots inhabiting terrestrial and semi-aquatic areas would be at risk for adverse effects to growth and development when exposed to flurprimidol. Specifically, seedling emergence and vegetative vigor are impacted. The risk quotients ranged from 1.3 to 340.9.

Flurprimidol Benefits

Flurprimidol is a plant growth regulator (PGR) that belongs to the pyrimidine class of chemicals. The active ingredient works through inhibition of gibberellin biosysnthesis, which prevents the synthesis of numerous gibberellins needed for normal plant growth and development. The use of PGRs is intended to offer time and labor savings to homeowners, as well as aesthetic functions for landscapes. Plant growth regulators have been used commercially on turf and ornamental sites to inhibit plant growth or seed production in order to reduce costs and maintain desired plant shapes. On commercial turf grass and golf courses, PGRs are used to slow the growth of turf grass in order to reduce time and labor costs of mowing and edging. On ornamental shrubs and ground cover plants, PGRs are used by nurseries and commercial landscapers to reduce pruning costs and for aesthetic purposes of maintaining compact or desirable shapes.

There are four PGR active ingredients currently registered and labeled for residential use. As PGRs, these products provide similar, although not necessarily identical, results as flurprimidol. These products are applied to plants as liquid sprays. The proposed flurprimidol new uses are comprised of multiple products formulated as soluble concentrates, emulsifiable concentrates, and granular formulations. None of the other PGR products that currently have residential uses are in granular form. Approving the proposed new uses for flurprimidol will provide applicators and homeowners with a new PGR formulation which can be used as a tool for improving the quality of turf grass and ornamentals in residential and non-occupational settings.

Proposed Regulatory Decision

The Agency is proposing to grant new uses of the active ingredient, flurprimidol, formulated as a technical product and multiple end-use products, for application to turf grass and ornamentals in commercial, municipal, and residential settings under FIFRA 3c7B. The Agency published a notice of receipt (NOR) of applications in the *Federal Register (January 27, 2010)* for new uses of flurprimidol. No comments were received.

The Occupational and Residential Exposure/Risk Assessment was completed on October 12, 2009 and concluded that the proposed new uses did not exceed the Agency's level of concern. Based on lack of evidence of neurotoxicity or immunotoxicity and use of oral studies for route-to-route extrapolation for inhalation exposure assessment, the database was considered adequate for purposes of the assessment and an additional database uncertainty factor (UF_{DB}) was not applied for the lack of these studies. However, in accordance with the revised 40 CFR part 158, the following studies are required to satisfy toxicological data requirements:

- 1) rat acute and subchronic neurotoxicity studies
- 2) immunotoxicity study
- 3) rat 28-day inhalation toxicity study

The Environmental Fate and Ecological Risk Assessment was completed on June 9, 2010 and concluded that the flurprimidol database is largely complete. In addition, the assessment did not indicate any data gaps or deficiencies that would require conditions of registration.

In order to mitigate risks to non-target organisms, the registrant has limited the proposed application methods to banding/edging. This will dramatically reduce the amount of area being treated from the originally proposed broadcast application and will ensure that the pesticide remains on the intended treatment area, and thereby reducing the potential for exposure to non-target organisms. In addition the Agency proposes to require the use of surface water advisories (as described above in section A. Environmental Fate) and an Environmental Hazards warning that will be required on all labeling, which may further reduce possible exposure to non-target organisms. For the reasons described in the Ecological Risk section above, exposure will likely be less than actually modeled for birds, mammals, reptiles, and terrestrial amphibians.

The Agency proposes to require the following labeling revisions:

All Labels

Environmental Hazards:

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean water mark. Do not contaminate water when disposing of rinseate or washwater.

Ground Water Advisory:

This pesticide has properties and characteristics associated with chemicals detected in ground water. This chemical may leach into ground water if used in areas where soils are permeable, particularly where the water table is shallow.

Surface Water Advisory:

This product is classified as having a potential for reaching surface water via runoff. A level, well-maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs, will reduce the potential loading of flurprimidol from runoff and sediment.

Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical resistance category selection chart.

Mixers, loaders, applicators, and other handlers must wear the following:

-Chemical-resistant gloves

Re	commendation o	f D	ivision Directors		
	Negotiated	Dı	ue Dates		
Decision #: 398756, 398768, 398767, 398765, 398769, 398766	Registration#: 19 67690-44, 67 and 67690-13			Petition	on #: N/A
Fee Category: R230			PRIA Decision T	ime Fi	rame: 15 months
Submitted by: Rose Mary Kearns		_	Branch: Fungicio	ie	Date
Company: Sepro Corporation					
Original Due Date: November 27,	2009	Pr	oposed New Due	Date:	December 30, 2010
Previous Negotiated Due Dates Ju	ine 30 <u>,</u> 2010, Sep	tem	iber 30, 2010, Nov	ember (30, 2010
Is the "Fix" in-house? YES			If not, date "Fix	" expe	cted: N/A
Issue (describe in detail) Additional comment period (12-7-2010) exceed advised that new data matrices were	s the current PRL	A d	ue date of 11-30-2	010. Th	ne registrant was also
Summary of Deficiency Type(s): Product Chemistry: Acute Telegraphics Not Subnox: Efficacy	nitte y: _	ed (N) Deficien Labeling: _	cies (D _ Othe	er (describe):	
Describe Interactions with Comparesponse to previous negotiated du 24, 2010 to request an extension and letter on November 29, 2010.	ie dates): Shaja J	Joyı	ner, PM 20 contact	ed the 1	registrant on November
"75 Day" Letter sent? (Dat	e sent) Yes	-	No and reason fo	r none	e? No
Rationale for Proposed Due Date:		_			
Registrant notified that this is the	last negotiation?		Yes X_N	ot App	olicable
Approve: V		<u>L</u>	Disapprove:		
If disapproved, action to be taken:	(٨		
OD or DOD Signature:	11/wl			Date	11-30-10
\mathbb{W}	1 100	_	1		

Re		of Division Directors I Due Dates				
Decision #: 398756, 398768, 398767, 398765, 398769, and 398766		Registration#: 67690-13, 67690- 15, 67690-16, 67690-19, 67690-44, and 67690-46				
Fee Category: R230		PRIA Decision T	Fime Frame: 15 months			
Submitted by: Erik Kraft / Cynthia	Giles-Parker	Branch: Fungicio	de Date Sept. 20, 2010			
Company: Sepro Corporation		-				
Original Due Date: November 27,	2009	Proposed New Due	Date: November 30, 2010			
Previous Negotiated Due Dates Ju	ane 30, 2010 and	September 30, 2010				
Is the "Fix" in-house? YES		If not, date "Fix	" expected: N/A			
was routed to HED, EFED, and OGC on 5-19-10. In the EFED risk assessment acute and chronic risks to mammals were identified. RD spent 5-19-10 to 6-15-10 working with EFED to refine the risks and modeling. EFED issued a revised risk assessment on 6-9-10. The refined risk assessment still identified chronic risks to mammals. Erik Kraft and Jeff Herndon contacted the registrant on 6-15-10 to mitigate the risks to mammals and discuss the outstanding issues. The registrant agreed to submit in new information to help clarify the issue. On 9-17-10 the registrant agreed to remove all the new broadcast uses and only keep the new edging/banding uses. By doing this, there is no longer a chronic risk to mammals. Summary of Deficiency Type(s): Not Submitted (N) Deficiencies (D)						
Summary of Deficiency Type(s): Product Chemistry: Acute To (Outstanding Eco Risk)						
Describe Interactions with Comparesponse to previous negotiated duthe registrant and EFED to mitigate to persuaded to remove the proposed net treatments (this was the only option is no longer a chronic risk to mamma	the chronic risks to the chronic risks to the broadcast uses for the registrant vals, as the chronic	o-15-10 to 9-17-10 Eri o mammals. On 9-17- and only keep the pro without withdrawing t risk was triggered by	k Kraft has been working with -10 the registrant was possed new banding/edging he action). By doing this, there broadcast applications.			
"75 Day" Letter sent? (Date	e sent) Yes	No and reason fo	or none? No (NA)			
Rationale for Proposed Due Date: RD will need an additional 60 days so that the action can go through the public process. This includes reviewing new labels and having enough time for the action to go through the public process.						
Registrant notified that this is the	last negotiation?	Yes X N	ot Applicable			
Approve:		Disapprove:				
If disapproved, action to be taken:						
OD or DOD Signature:) IAmerica		Date: 0, 59., 3			



To: Cc: Bcc:

Subject: Fw: flurprimidol PRIA extension - Decision Numbers D398766, D398766,

D398767, D398768, and D398769

From:

"Dugger-Ronyak, Amy" <amyd@sepro.com>

To:

Erik Kraft/DC/USEPA/US@EPA

Cc:

<imessina@exponent.com>, "Koschnick, Tyler" <tylerk@sepro.com>

Date:

06/23/2010 04:17 PM

Subject:

RE: flurprimidol PRIA extension - Decision Numbers D398756, D398765, D398766, D398767,

D398768, and D398769

Erik,

SePRO Corporation agrees to a PRIA extension through September 30/October 1, 2010 for EPA Decision numbers D398756, D398765, D398766, D398767, D398768, and D398769. If at any time during this extension period EPA has questions that would facilitate a faster review/posting of this action, please contact me.

Thank you for all your help with working through this action. It is very important to SePRO.

Best Regards,

Amy Dugger-Ronyak, Regulatory Affairs Specialist SePRO Corporation | 11550 N. Meridian St., Ste. 600 | Carmel, IN 46032 USA 317-580-8286 (phone) 317-388-3334 (fax) amyd@sepro.com

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Re	commendation of D Negotiated D				
Decision#:398756, 398768, 398767, 3978765, 398769, 398766	· · · · · · · · · · · · · · · · · · ·			on #:N/A	
Fee Category: R230		PRIA Decision T	ime Fr	rame:15 Months	
Submitted by: Cynthia Giles-Park	ær	Branch: Fungici	de	Date: 2/12/2010	
Company: Sepro Corporation					
Original Due Date: November 27,	2009 Pr	oposed New Due	Date: J	une 30, 2010	
Previous Negotiated Due Dates: Ja	anuary 11, 2010, Fe	bruary 11, 2010			
Is the "Fix" in-house? Yes		If not, date "Fix	expe	cted:	
Issue (describe in detail): The Agency met with the Sepro Corporation and their Agent, James Messina to discuss the approved rates and risk assessments previously conducted by EFED. The Agency determined that a new assessment is needed to take into consideration the proposed label rates, new data and clear description of the proposed use sites. The company will provide new labels with the correct rates, use sites and discussion of the use areas for consideration in our review. Additional time is required to prepare a risk assessment (EFED), review new data and open the 30-day comment period during the Public Process.					
Summary of Deficiency Type(s): Product Chemistry: Acute T above.)					
Describe Interactions with Comparesponse to previous negotiated du Parker and Shaja Joyner) met with On December 16, the registrant se between Shaja Joyner, Cynthia Grubmissions. Again on February Rossi, Jeff Herndon, Cynthia Gile conducted by HED and to discuss company will provide new labels at Once the assessment has been companed for public review under the	the dates) On Decer the the company to dent back a response iles-Parker and the 3, 2010, the compan s-Parker and Shaja the next steps for deand a discussion of tappleted, the propose	mber 14, the Ager iscuss the need for to the meeting. So registrants to disc y representative a Joyner to discuss elivery of the EFE he use patterns fo d decision will be	ncy (Lo r the Pu everal c cuss per and the the ris CD risk or consi	is Rossi, Cynthia Giles- ublic Comment Process. emails transpired uding issues with the ir Agent, met with Lois k assessments assessment. The deration in our review.	
*75 Day" Letter sent?	(Date sent)	No and reason	for no	ne?	
Rationale for Proposed Due Date: assessment, and open Docket for t					
Registrant notified that this is the	last negotiation?	Yes x	Not Ap	plicable	
Approve: V	<u></u>	Disapprove:	=		
If disapproved, action to be taken					
OD or DOD Signature:	A Mar	<u> </u>	Date	e: 2-12-10	



<u>To</u>: Cc: Bcc:

Subject: SePRO Information

Cynthia,

On behalf of my client, SePRO Corporation (EPA Company Number), Exponent is agreeing to a new PRIA due date of June 30, 2010 for the following pending actions:

I.	Decision # D398756, EPA Reg. No. 67690-16 – Cutless Technical
II.	Decision # D398765, EPA Reg. No. 67690-15 – Cutless 50W Turf Plant Growth
Regulator	
III.	Decision # D398766, EPA Reg. No. 67690-13 – Cutless 0.33G Landscape Growth
Regulator	
IV.	Decision # D398767, EPA Reg. No. 67690-19 – Turf Fertilizer – Contains Cutless
0.5%	
V.	Decision # D398768, EPA Reg. No. 67690-44 - Turf Fertilizer - Contains Cutless
0.17%	
VI.	Decision # D398769, EPA Reg. No. 67690-46 – SP5075 Turf Growth Regulator

As discussed during our meeting with EPA on February 3, 2010, SePRO's preference is for the Agency to review all of the products and assess them in appropriate risk assessments. Based on our meeting it is our understanding that the Agency anticipates it can complete all of the pending actions and approve them by the end of June 2010.

SePRO is preparing a support paper related to the maximum and typical application rates for each of the above-referenced products. We plan to provide this to EPA for its reference in the next two weeks. Additionally, we have updated the product labels to clarify a few sections and will email PDFs of the updated labels to EPA in the next two weeks. Please note none of the updates affects application rates or use patterns, they simply clarify existing use patterns. The following summarizes the updates SePRO is seeking:

- Cutless 0.33G (67690-13)
 - Add language that clarifies the use to include ornamentals grown in container and field nurseries (right now the label states "landscape ornamentals") by professional applicators.
 - Highest single application rate for this type of use is 1.5 lbs ai/A as a broadcast application.
- Turf Fertilizer Contains Cutless 0.17% (67690-44)
 - o Add language to clarify use on landscape ornamentals (similar to what was submitted to EPA for 67690-19 and is under review with EPA), plus adding language allowing for use on container and field grown ornamentals. This is not a new use for flurprimidol as ornamentals are already approved by EPA.
 - This label would also be formatted as a split label (it isn't currently).

If you have any questions, please contact me.

Best Regards,

James Messina
Senior Managing Regulatory Consultant
Exponent
Center for Chemical Regulation and Food Safety
1150 Connecticut Avenue, N.W.
Suite 1100
Washington, DC 20036
202-772-4932
202-772-4979 fax
301-908-1181 cell

Recommendation of Division Directors Negotiated Due Dates					
Decision#: 398756, 398768, 398767, 398765, 398766	Registration#: 67690-16, 67690-44, 67690-19, 67690- 15, 67690-46, 67690-13		Petition #	#: NA	
Fee Category: R230	PRIA Decision Time Frame: 15 months				
Submitted Shaja Joyner	Branch: RD/FB			Date: 11/25/09	
Company: Sepro Corporation					
Original Due Date: November 27, 2009 Proposed New Due Date: January 11, 2010					
Previous Negotiated Due Dates: None					
Is the "Fix" In-house? Yes If Not, Date "Fix" Ex			"Fix" Expe	ected:	
The pending PRIA decisions have been identified as a "First" Residential Use, and were therefore considered as candidates for the Public Comment Process. Flurprimidol is currently registered for commercial turf grass. However, it was subsequently noted by HED that residential turf was previously incorporated into the risk assessment at that time when commercial turf was established (awaiting confirmation). A decision is pending with upper management as to whether or not these actions will be subject to the public comment process. The registrant vehemently opposes the Agency's decision to require the pending PRIA actions to undergo the Public Comment Process since they were submitted prior to the policy's implementation. Thus the registrant has only granted a maximum timeline of a 45 day extension.					
Summary of Deficiency Types(s): Not Submitted (N) Deficiencies (D) Product Chemistry: Acute Tox: Efficacy: Labeling					
Other (describe):X (See issue above)					
Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates): The Registration Manager (Amy Dugger-Ronyak) was contacted via voicemail and email on November 17 th . She was out of the office, and did not return until Monday, Nov. 23 rd , as indicated by her voicemail. A call was returned on Tuesday, Nov. 24 th to Rose Kearns and Shaja Joyner for further discussion. Although the registrant is not in favor or renegotiating for the required time of the Public Comment Process, a letter was submitted via email on the evening of Nov. 24 th for a 45 day extension.					
Was a "75-day Letter" Sent? Not Applicable					
Rationale for Proposed Due Date: The additional time is adequate to complete label reviews should it be determined that the pending PRIA actions are not subject to the Public Comment Process.					

Registrant Notified That This is the Last Negotiation?					
Yes No X Not Applicable					
Approve:	Disapprove:				
If disapproved, action to be taken:					
OD or DØD Signature:	Date: 11/25/09				



SePRO Corporation • 11550 North Meridian Street • Suite 600 • Carmel, Indiana 46032-4565 *Phone:* (317) 580-8282 Fax: (317) 428-4577

Submitted via Email

November 24, 2009

Ms. Shaja Joyner, PM 20
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive.
Arlington, VA 22202-4501

Re: EPA Request for Renegotiation of PRIA Date

- Decision # D398756, EPA Reg. No. 67690-16 Cutless Technical
- Decision # D398768, EPA Reg. No. 67690-44 Turf Fertilizer Contains Cutless 0.17%
- Decision # D398767, EPA Reg. No. 67690-19 Turf Fertilizer Contains Cutless 0.5%
- Decision # D398765, EPA Reg. No. 67690-15 Cutless 50W Turf Plant Growth Regulator
- Decision # D398769, EPA Reg. No. 67690-46 SP5075 Turf Growth Regulator
- Decision # D398766, EPA Reg. No. 67690-13 Cutless 0.33G Landscape Growth Regulator

Dear Ms. Joyner:

With regard to EPA's request to extend the PRIA timeline for the above Decision numbers by 120 days (4 months) from the 11/27/2009 PRIA date, <u>SePRO is willing to negotiate an extension thru January 11, 2010</u>.

As previously indicated in an email dated 11/23/2009 to you and Ms. Rose Kearns, the original submission was timed and planned out more than 2 years ago with a plan to bring these new product concepts to market in the first quarter 2010. A 120 day extensions beyond the original PRIA date would effectively eliminate these products from the market for the next year due to the time it would subsequently take to obtain state registrations and taking into account the use season (spring/early summer).

While SePRO understands EPA's new policy/mandate with regard to transparency and public comments, it is inappropriate to delay these pending PRIA actions as a result of this new policy. PRIA actions that were established prior to the new public comment policy/mandate



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should be grandfathered in under EPA's old policies/practices as registrant's business plans and submissions were made with regard to these practices.

EPA's new policy/mandate with regard to transparency and public comments was itself established without transparency or allowing for registrants to comment and/or address concerns that may arise from this new policy/mandate, specifically how EPA would handle PRIA actions that were already under review with the Agency. This new policy/mandate was adopted in a manner inconsistent with EPA's previous commitment to not adopt significant new policies without prior notice and comment and goes against Pesticide Registration Notice 2003-3, known as the "Policy on Policies".

SePRO has historically and will continue to strive to work with EPA toward meeting both our and the Agency's goals regarding registration actions. As such, we agree to an extension thru January 11, 2010. However, any further delay in the PRIA date for the above Decision numbers will irreparably and negatively affect SePRO's business for all 6 of these products for the next calendar year.

No comments to the new proposed label changes have been made to the public docket at this time; it is highly unlike any will be made. With this in mind, and providing no comments are made, SePRO reiterates our request that EPA approve these Decision numbers by the newly negotiated PRIA date of January 11, 2010.

If you have any questions regarding this submission, please contact me at 317-580-8286 or amyd@sepro.com.

Best regards,

Amy Dugger-Ronyak

Regulatory Affairs Specialist

amy Dugger-Ronyak

Enclosure (1) "CropLife America Letter to EPA from Jay Vroom"



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

MEMORANDUM

Date:

June 18, 2010

Subject:

Flurprimidol: Addendum to the 10/12/2009 Occupational and Residential

Exposure/Risk Assessment of Flurprimidol for Section 3 Registration of New Uses

in Residential and Non-Occupational Settings.

PC Code: 125701

DP Barcode: D375393

MRID No.:

Registration No.: 67690-16

Petition No.: NA

Regulatory Action: Section 3 Registration

Assessment Type: ORE

Reregistration Case No.: None

TXR No.: None

CAS No.: 56425-91-3

Decision No.: 398756

40 CFR: NA

TO:

Rosemary Kearns/Tony Kish (RM22)

Registration Division (7505P) Office of Pesticide Programs

FROM:

Shih-Chi Wang, Biologist Risk Assessment Branch 2

Health Effects Division (7509P)

THRU:

Christina Swartz, Chief

Risk Assessment Branch 2

Health Effects Division (7509P)

HED completed an evaluation of occupational and non-dietary residential exposures associated with the use expansion of the plant growth regulator, flurprimidol, on turf (S. Wang, D357307, 10/12/2009). Risks associated with the proposed use expansion to allow use on residential turf and to allow use by residential handlers were not of concern. After the assessment was completed, HED was requested to clarify/justify the use of ORETF (Occupational and Residential Exposure Task Force) data in the assessment, since the registrant, Sepro Corp., is not a member of the Task Force. The registrant suggested that PHED (Pesticide Handlers Exposure Database) unit exposures would be appropriate for use in the assessment, and are also publicly available and therefore not subject to data compensation.

This addendum presents revised exposure and risk associated with the proposed use expansion of flurprimidol on residential turf, previously assessed by HED (S. Wang, 10/12/2009, D357307). The

addendum has been completed to incorporate the correct unit exposures for the scenarios using ORETF (Occupational and Residential Exposure Task Force) data, and to address the use of task force data versus the use of data and unit exposures from the Pesticide Handlers Exposure Database (PHED).

CONCLUSIONS

Revised Exposure and Risk Estimates

For the revised risk estimates, the exposures resulting from Scenarios 6, 7 and 8 in the 10/2009 memo were re-evaluated based on the correct/updated ORETF unit exposures. The short-term MOEs for these scenarios are 1,800, 16,000 and 2,800, respectively, and the intermediate-term MOEs for these scenarios are 310, 2,800, and 490, respectively. These MOEs are captured in the attached Tables 1 and 2. Further, based on the revised values, Tables 9 and 10 from the 10/2009 document should be replaced with Tables 3 and 4 of this addendum.

Use of Task Force Data in the ORE Assessment

To assess the proposed use expansion, HED used a combination of data sources, including the ORETF data, PHED data, and a chemical-specific study to determine risks for occupational and residential handlers. Specifically, for residential handlers, HED used the ORETF unit exposures for mixing/loading/applying granules with a push-type spreader. For occupational handlers, HED used the ORETF unit exposures to assess mixer/loader/applicator risks for scenarios including use of a handgun to apply liquids and wettable powders, and for workers applying granules with a push-type spreader. In an assessment submitted by the registrant, MRID 47510001, chemical-specific and PHED unit exposures were used to assess all occupational and residential handlers' exposures. In a letter dated 12/16/2009, the registrant, SePRO Corp., objected to the Agency's use of Task Force data, since they are not a member of the ORETF and would not be in a position to provide compensation. Further, they maintained that the risks are not of concern with the use of chemical-specific and PHED data.

The study conducted by the ORETF for the push-type granular spreader involved 20 individual participants recruited from local garden clubs whereas the PHED study involved repeated measures of 6 participants for a total of 15 measurements of dermal and inhalation exposure. In addition, the PHED study relied on some study personnel recruited as study participants, which is unacceptable based on current standards. The use of study personnel, coupled with more independent measures in the ORETF data, was the reason HED relied on the ORETF data for the push-type spreader. In general, HED's policy is to use the most reliable data available for each scenario. Often HED determines which data are the most reliable based on the study designs, and for some scenarios the Task Force data are superior to those in PHED based on the use of whole-body dosimetry, and the much higher quality QA/QC aspects regarding field fortifications and limits of quantification. Another consideration is the use of repeat measurements of subjects to develop each scenario. However, HED does concur with Sepro Corp. regarding the safety finding. Regardless of the source of unit exposures, ORETF, PHED and chemical-specific data where appropriate, the risks associated with the proposed use expansion are not of concern.

Table 1. Revised Short-Term Non-Cancer Risk for Occupational Handlers.

Exposure Scenario (Scenario #)	Mitigation Level ^a	Dermal Unit Exposure ^b (mg/lb ai)	Inhalation Unit Exposure ^c (µg/lb ai)	Crop	Application Rate (lb ai/A)	Amount Treated ^d (A/day)	Daily Dermal Dose ^c (mg/kg/day)	Daily Inhalation Dose ^r (mg/kg/day)	Combined Daily Dose ² (mg/kg/day)	MOE
				М	ixer/Loader/Appl	icator				
Wettable Powder (WSP) with Handgun (6)	Single layer +gloves	0.64 (ORETF)	7.2 (ORETF)	Turf	1.5	5	0.0048	0.0009	0.0057	1,800
Liquid with Handgun (7)	Single layer +gloves	0.45 (ORETF)	1.8 (ORETF)	Turf	0.26	5	0.00059	0.000039	0.000629	16,000
Granules with Push-Type Spreader (8)	long pants short sleeve	0.35 (ORETF)	7.3 (ORETF)	Turf	1.5	5	0.00263	0.00091	0.00354	2,800

- a Baseline consists of long-sleeve shirt, long pants, shoes, and socks and no respirator. PPE consists of long-sleeve shirt, long pants, shoes, socks, chemical-resistant gloves, and no respirator.
- b Baseline Dermal Unit Exposure represents long pants, long sleeved shirt, no gloves, open mixing/loading, and open cab tractors, as appropriate.
- c Baseline Inhalation Exposure represents no respiratory protection, open mixing/loading, and open cab tractors, as appropriate.
- d Daily acres treated values are from EPA estimates of acreage that could be treated or volume handled in a single day for each exposure scenario of concern, based on the application method and formulation/packaging type.
- e Daily dermal dose (mg/kg/d) = [unit dermal exposure (mg/lb ai) * dermal absorption (0.06) * application rate (lb ai/acre) * daily acres treated / body weight (60 kg).
- f Daily inhalation dose (mg/kg/d) = (unit exposure (µg/lb ai) * (1mg/1000 µg) conversion * application rate (lb ai/acre) * daily acres treated / body weight (60 kg).
- g Combined daily dose = daily dermal dose + daily inhalation dose.
- h MOE = NOAEL (10 mg/kg/d) / combined daily dose. UF = 100.

Table 2. Revised Intermediate-Term Non-Cancer Risk for Occupational Handlers.

Exposure Scenario (Scenario #)	Mitigation Level	Dermal Unit Exposure ^b (mg/lb ai)	Inhalation Unit Exposure ^c (µg/lb ai)	Crop	Application Rate (lb ai/A)	Amount Treated ^d (A/day)	Daily Dermal Dose ^e (mg/kg/day)	Daily Inhalation Dose ^r (mg/kg/day)	Combined Daily Dose ² (mg/kg/day)	MOE ^h
				N	lixer/Loader/App	licator	<u> </u>			<u> </u>
Wettable Powder (WSP) with Handgun (6)	Single layer +gloves	0,64 (ORETF)	7.2 (ORETF)	Turf	1.5	5	0.00411	0.00077	0.00488	310
Liquid with Handgun (7)	Single layer +gloves	0.45 (ORETF)	1.8 (ORETF)	Turf	0.26	5	0.00050	0.000033	0.000533	2,800
Granules with Push-Type Spreader (8)	long pants short sleeve	0.35 (ORETF)	7.3 (ORETF)	Turf	1.5	5	0.00225	0.00078	0.003032	490

- Baseline consists of long-sleeve shirt, long pants, shoes, and socks and no respirator. PPE consists of long-sleeve shirt, long pants, shoes, socks, chemical-resistant gloves, and no respirator.
- b Baseline Dermal Unit Exposure represents long pants, long sleeved shirt, no gloves, open mixing/loading, and open cab tractors, as appropriate.
- Baseline Inhalation Exposure represents no respiratory protection, open mixing/loading, and open cab tractors, as appropriate.
- d Daily acres treated values are from EPA estimates of acreage that could be treated or volume handled in a single day for each exposure scenario of concern, based on the application method and formulation/packaging type.
- e Daily dennal dose (mg/kg/d) = Junit dermal exposure (mg/lb ai) * dermal absorption (0.06) * application rate (lb ai/acre) * daily acres treated / body weight (70 kg).
- f Daily inhalation dose (mg/kg/d) = (unit exposure (µg/lb ai) * (1mg/1000 µg) conversion * application rate (lb ai/acre) * daily acres treated / body weight (70 kg).
- g Combined daily dose = daily dermal dose + daily inhalation dose.
- h MOE = NOAEL (1.5 mg/kg/d) / combined daily dose. UF = 100.

Table 3. Short-term Non-Cancer Risk for Occupational Handlers.

Exposure Scenario (Scenario #)	Mitigation Level ²	Dermal Unit Exposure ⁵ (mg/lb ai)	Inhalation Unit Exposure ^c (µg/lb ai)	Сгор	Application Rate (lb ai/A)	A mount Treated ^d (A/day)	Daily Dermal Dose ^e (mg/kg/day)	Daily Inhalation Dose ^f (mg/kg/day)	Combined Daily Dose ² (mg/kg/day)	MOE
	_	_			Mixer/Loader	т				
Wettable Powder (WSP) for Ground-boom for ground-boom (1)a	Single layer no gloves	0.021 (PHED)	0.24 (PHED)	Turf	1.5	80	0.00252	0.00048	0.003	3,300
Wettable Powder (WSP) for Ground-boom for ground-boom (1)b	long pants short sleeve	0.0227 (Day 1987)	0.726 (Day 1987)	Turf	1.5	80	0.002724	0.001452	0.004176	2,400
Liquid for Ground-boom (2)	Single layer no gloves	2.9 (PHED)	1,2 (PHED)	Turf	0.26	80	0.06032	0,000416	0.060736	170
Granules for Tractor- Drawn Spreader (3)	Single layer no gloves	0.0084 (PHED)	1.7 (PHED)	Turf	1.5	80	0.001008	0.0034	0.004408	2,300
	·	<u> </u>			Applicator					
Sprays with Ground-boom (4)a	Single layer no gloves	0.014 (PHED)	0,74 (PHED)	Turf	1.5	80	0.00168	0.001479	0.003159	3,200
Sprays with Ground-boom (4)a	Single layer no gloves	0.014 (PHED)	0.74 (PHED)	Turf	0.26	80	<0.00168	<0.001479	<0.003159	>3,200
Sprays with Ground-boom (4)b	long pants short sleeve	0.0639 (Day 1987)	0.455 (Day 1987)	Turf	1.5	80	0.00768	0.000909	0.008589	1,200
Sprays with Ground-boom (4)b	long pants short sleeve	0.0639 (Day 1987)	0.455 (Day 1987)	Turf	0.26	80	<0.00768	<0.000909	<0.008589	>1,200
Granules with Tractor- Drawn Spreader (5)	Single layer no gloves	0.0099 (PHED)	1.2 (PHED)	Turf	1.5	80	0.001188	0.0024	0.003588	2,800
	_	-		· · · · · · · · · · · · · · · · · · ·	Mixer/Loader/App	licator				
Wettable Powder (WSP) with Handgun (6)	Single layer +gloves	0.64 (ORETF)	7.2 (ORETF)	Turf	1.5	5	0.0048	0.0009	0.0057	1,800
Liquid with Handgun (7)	Single layer +gloves	0.45 (ORETF)	1.8 (ORETF)	Turf	0.26	5	0.00059	0.000039	0.000629	16,000
Granules with Push-Type Spreader (8)	long pants short sleeve	0.35 (ORETF)	7.3 (ORETF)	Turf	1.5	5	0.00263	0.00091	0.00354	2,800
Granules with Belly-Grinder (9)	Single layer no gloves	10 (PHED)	62 (PHED)	Turf	1.5	1	0.015	0.001545	0.016545	600

a Baseline consists of long-sleeve shirt, long pants, shoes, and socks and no respirator. PPE consists of long-sleeve shirt, long pants, shoes, socks, chemical-resistant gloves, and no respirator.

b Baseline Dermal Unit Exposure represents long pants, long sleeved shirt, no gloves, open mixing/loading, and open cab tractors, as appropriate.

c Baseline Inhalation Exposure represents no respiratory protection, open mixing/loading, and open cab tractors, as appropriate.

d Daily acres treated values are from EPA estimates of acreage that could be treated or volume handled in a single day for each exposure scenario of concern, based on the application method and

formulation/packaging type.

- e
- Daily dermal dose (mg/kg/d) = [unit dermal exposure (mg/lb ai) * dermal absorption (0.06) * application rate (lb ai/acre) * daily acres treated / body weight (60 kg). Daily inhalation dose (mg/kg/d) = (unit exposure (µg/lb ai) * (1mg/1000 µg) conversion * application rate (lb ai/acre) * daily acres treated / body weight (60 kg). f
- Combined daily dose = daily dermal dose + daily inhalation dose. MOE = NOAEL (10 mg/kg/d) / combined daily dose. UF = 100. g h

Table 4. Intermediate-Term Non-Cancer Risk for Occupational Handlers.

Exposure Scenario (Scenario #)	Mitigation Level*	Dermal Unit Exposure ^b (mg/lb ai)	Inhalation Unit Exposure ^c (µg/lb ai)	Crop	Application Rate (lb ai/A)	Amount Treated ^d (A/day)	Daily Dermal Dose ^e (mg/kg/day)	Daily Inhalation Dose ⁽ (mg/kg/day)	Combined Daily Dose ^s (mg/kg/day)	MOE ^b
_					Mixer/Loader	Г				
Wettable Powder (WSP) for Ground-boom for ground-boom (1)a	Single layer no gloves	0.021 (PHED)	0.24 (PHED)	Turf	1,5	80	0.00216	0.000411	0.002571	580
Wettable Powder (WSP) for Ground-boom for ground-boom (1)b	long pants short sleeve	0.0227 (Day 1987)	0.726 (Day 1987)	Turf	1.5	80	0.00234	0.001245	0.003585	420
Liquid for Ground-boom (2)	Single layer no gloves	2.9 (PHED)	1.2 (PHED)	Turf	0.26	80	0.0517	0.000357	0.052057	29
Liquid for Ground-boom (2)	Single layer +gloves	0.023 (PHED)	1.2 (PHED)	Turf	0.26	80	0.000407	0.000357	0.000764	2,000
Granules for Tractor- Drawn Spreader (3)	Single layer no gloves	0.0084 (PHED)	1.7 (PHED)	Turf	1.5	80	0.000864	0.002914	0.003778	400
)	·	<u> </u>)	Applicator	·		·	<u></u> _	<u> </u>
Sprays with Ground-boom (4)a	Single layer no gloves	0.014 (PHED)	0.74 (PHED)	Turf	1.5	80	0.00144	0.001269	0.002709	550
Sprays with Ground-boom (4)a	Single layer no gloves	0.014 (PHED)	0.74 (PHED)	Turf	0.26	80	0.000248	0.000218	0.000466	3,200
Sprays with Ground-boom (4)b	long pants short sleeve	0.0639 (Day 1987)	0.455 (Day 1987)	Turf	1.5	80	0.00657	0.00078	0.00735	200
Sprays with Ground-boom (4)b	long pants short sleeve	0.0639 (Day 1987)	0.455 (Day 1987)	Turf	0.26	80	0.00113	0.000134	0.001264	1,200
Granules with Tractor- Drawn Spreader (5)	Single layer no gloves	0.0099 (PHED)	1.2 (PHED)	Turf	1.5	80	0.001018	0.002057	0.003075	500
					Mixer/Loader/App	licator				
Wettable Powder (WSP) with Handgun (6)	Single layer +gloves	0.64 (ORETF)	7.2 (ORETF)	Turf	1.5	5	0.00411	0.00077	0.00488	310
Liquid with Handgun (7)	Single layer +gloves	0.45 (ORETF)	1.8 (ORETF)	Turf	0.26	5	0.00050	0.000033	0.000533	2,800
Granules with Push-Type Spreader (8)	long pants short sleeve	0.35 (ORETF)	7.3 (ORETF)	Turf	1.5	5	0.00225	0.00078	0.003032	490
Granules with Belly-Grinder (9)	Single layer no gloves	10 (PHED)	62 (PHED)	Turf	1.5	1	0.012855	0.001329	0.014184	110

Baseline consists of long-sleeve shirt, long pants, shoes, and socks and no respirator. PPE consists of long-sleeve shirt, long pants, shoes, socks, chemical-resistant gloves, and no respirator.

- b Baseline Dermal Unit Exposure represents long pants, long sleeved shirt, no gloves, open mixing/loading, and open cab tractors, as appropriate.
- c Baseline Inhalation Exposure represents no respiratory protection, open mixing/loading, and open cab tractors, as appropriate.
- d Daily acres treated values are from EPA estimates of acreage that could be treated or volume handled in a single day for each exposure scenario of concern, based on the application method and formulation/packaging type.
- e Daily dermal dose (mg/kg/d) = [unit dermal exposure (mg/lb ai) * dermal absorption (0.06) * application rate (lb ai/acre) * daily acres treated / body weight (70 kg).
- f Daily inhalation dose (mg/kg/d) = (unit exposure (μg/lb ai) * (1mg/1000 μg) conversion * application rate (lb ai/acre) * daily acres treated / body weight (70 kg).
- g Combined daily dose = daily dermal dose + daily inhalation dose.
- h MOE = NOAEL (1.5 mg/kg/d) / combined daily dose. UF = 100



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON D.C., 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

PC Code: 125701

DP Barcode: D374783, D374788, D374790

D374791, D374792, D374796

Date: June 9, 2010

MEMORANDUM

SUBJECT:

Revised Section 3 Environmental Fate and Ecological Risk Assessment of

Flurprimidol Proposed for New Uses on Turf grasses and Ornamentals.

TO:

Tony Kish, Product Manager

Bryant Crowe, Risk Manager Reviewer

Registration Division (7505P)

FROM:

Stephen Carey, Biologist

James C. Hethir 6/9/10 James K. Wolf, Ph.D., Environmental Scientist

Environmental Risk Branch III

THROUGH:

James A. Hetrick, Ph.D., Senior Scientist

Pamela Hurley, Ph.D., Senior Scientist

Dana Spatz, Branch Chief

Environmental Risk Branch III

Environmental Fate and Effects Division (7507P)

This Section 3 ecological risk assessment was conducted for the proposed labeled uses for outdoor and residential use in right-of-ways, industrial, golf resorts, and athletic fields. commercial, municipal and residential turf using the active ingredient, flurprimidol, as a plant growth regulator to control growth of turf grasses, ornamentals, and a variety of bedding, flowering, bulb crop, perennial, and woody landscape plants.

This risk assessment was revised to update the terrestrial exposure analysis for banded application to ground surfaces. In the previous assessment, the inputs for banded applications modeled in T-REX reflected agricultural practices where a band application is made between rows of an acre field rather than around the perimeter of an area or building; thus, the revised RQs for "banded" applications occurring on the edge of a site are adjusted using broadcast applications with the understanding that the entire acre will not be completely treated when "banded" applications are applied as little as six inches wide on the edge/perimeter of an area.

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I. Executive Summary

A. Nature of the Chemical Stressor

Flurprimidol (RS)-2-methyl-1-pyrimidin-5-yl-1-(4-trifluoromethoxyphenyl)propan-1-o1, a plant growth regulator, was developed to reduce internode elongation of plants through the inhibition of gibberellin biosynthesis. Reduced plant growth improves the management and quality of perennial cool and warm seasons turf grasses on golf courses, athletic fields, commercial, municipal, and residential turf and perennial landscape and container grown ornamental plants.

There are five active products for flurprimidol considered in this assessment: Reg. No. 67690-15, Cutless 50W Turf Growth Regulator; Reg. No. 67690-46, SP5075 Turf Growth Regulator; Reg. No. 67690-19, Turf Fertilizer – Contains Cutless 0.5%; Reg. No. 67690-44, Turf Fertilizer – Contains Cutless 0.17% and Reg. No. 67690-13, Cutless 0.33G Landscape Growth Regulator. These products are labeled for terrestrial outdoor and residential sites as a non-crop use. The products are applied via ground boom-type and backpacker sprayers, and granular spreaders.

B. Potential Risk to Non-target Organisms

Based on all available data, including the submission of new studies, potential chronic risk from the proposed new uses of flurprimidol on turf grasses and ornamentals is expected for birds and mammals. Acute risks to mammals are presumed. The potential for risks to aquatic non-vascular plants is minimal; however, risks to aquatic vascular and terrestrial plants are expected since flurprimidol is a plant growth regulator. Minimal acute and chronic risks to aquatic organisms and minimal acute risk to birds are presumed.

Table I-1 presents the Risk Quotients (RQs) and use patterns used to determine the potential risks to terrestrial and aquatic organisms and plants exposed to flurprimidol.

Table I-1. Summary of Risk Quotient Calculation for Flurprimidol Exposures to							
Terrestrial and	Aquatic Organism	is and Plants.*		_			
	Flurprimidol RQs and Use Patterns						
Species	Broadcast Spray	Banded Spray	Broadcast	Banded			
	Granular Granular						
	Aqua Aqua	tic Organisms and	Plants				
Fish			e RQs: <0.01				
	<u> </u>		Qs: <0.1 - 0.13	 -			
Invertebrates		•	e RQs: <0.01				
			nic RQs: <0.1				
Aquatic Non-			lant RQs: 0.14 - 0.16				
Vascular Plants	_ <u> </u>		t RQs: 0.42 – 0.49				
Aquatic Vascular	Non-Listed Plant RQ		Non-Listed Plant RQ				
Plants	Listed Plant RQs: 1.7		Listed Plant RQs: 4.6	5 - 8.42			
	<u> </u>	strial Animals and	Plants	<u> </u>			
₹. ·	Acute RQs: NC		Acute RQs: NC				
Birds	Chronic RQs:	Acute RQs: NC	Chronic RQs:	Acute RQs; NC			
	<0.1-1.6	<u></u>	<0.1	<u>. </u>			
•	Acute RQs:		Acute RQs:				
Mammals	<0.1-0.3	Acute RQs:	0.06 - 1.3	Acute RQs:			
Manuitais	Chronic RQs:	0.01 - 0.31	Chronic RQs:	0.03 – 0.67			
	<0.1-30	<u> </u>	1.0>	<u> </u>			
Terrestrial	Non-Listed Plant RQ	s; <0.1 – 2.7	Non-Listed Plant RQ				
Monocots	Listed Plant RQs: <0	.I – 10	Listed Plant RQs: <0	.1 - 40			
Terrestrial Dicots	Non-Listed Plant RQ		Non-Listed Plant RQ				
Terresurai Dicois	Listed Plant RQs: <0	.1 - 125	Listed Plant RQs: <0	1 - 341			

^{*} Bold entries indicate LOC exceedance

C. Conclusions – Exposure Characterization

Based on all acceptable and supplemental data, the major routes of dissipation for flurprimidol are expected to be leaching and runoff, plant uptake because the compound is a systemic plant growth regulator, and photolysis in aqueous systems. Flurprimidol is stable to hydrolysis and resistant to degradation in both aerobic and anaerobic terrestrial environments and is assumed to be similarly persistent in both aerobic and anaerobic aquatic environments. Flurprimidol is highly mobile in soil, is of moderate solubility in sterile water, has a low potential for bioaccumulation based on its bioconcentration factors (BCF) and rapid depuration, and is not expected to volatilize.

Given this profile, the main routes of exposure from use of flurprimidol are expected to be runoff and spray drift and direct ingestion of assessed feed items and granules. Given the low K_d of this plant growth regulator, transport with and accumulation in sediment are not expected to be significant routes of exposure. Typically, EFED evaluates the potential for aquatic exposure to pesticides through an assessment of available surface water and groundwater monitoring data and modeling. For flurprimidol, no monitoring data were available for use in this assessment; therefore, potential exposure to flurprimidol in water was evaluated through modeling. For this assessment, EFED relied on Tier I and II modeling using GENEEC2 and PRZM/EXAMS, respectively, for aquatic exposure concentrations (Appendices A and B). Terrestrial residues

NC - RQs not calculated since toxicity was greater than the highest doses tested; potential risk is presumed minimal

were predicted using T-REX version 1.3.1 (**Appendix C**) and earthworm fugacity model (**Appendix D**). TerrPLANT version 1.2.2 (**Appendix E**) was modeled for terrestrial plants.

D. Conclusions - Ecological Effects Characterization

Laboratory toxicity data suggest that flurprimidol is slightly toxic on an acute basis to freshwater animals, with fish and invertebrate LC50s ranging from 12-18 mg a.i./L. There are no acute toxicity data available to characterize acute effects to their estuarine/marine counterparts; however, based on data for freshwater animals, flurprimidol is assumed to be, at most, slightly toxic to estuarine/marine organisms. Chronic toxicity data indicate reductions in fry survival, length, and weight of freshwater fish and reductions in days of first brood, young per adult, and adult length of invertebrates, with fish and invertebrate NOAECs ranging from 0.939 to 2.95 mg a.i./L. Toxicity data for aquatic vascular and non-vascular plants identified EC50s of less than 1 mg a.i./L.

Acute oral and subacute dietary toxicity tests suggest that flurprimidol is practically nontoxic to birds. Flurprimidol is slightly toxic to mammals on an acute oral basis, with an LD50 of 709 mg a.i./kg-bw. Chronic toxicity data with birds indicate reductions in egg production, embryo survival, and hatchability as low as 309 mg a.i./kg-diet. A two-generation chronic mammalian (rat) toxicity study demonstrated decreased mating, fertility, and fetal survival (stillbirths) in both generations at flurprimidol levels of 1000 mg a.i./kg-diet (equivalent to 74 mg a.i./kg-bw/day) and a reproductive NOAEL of 100 mg a.i./kg-diet (equivalent to 7.3 mg a.i./kg-bw/day).

E. Listed Species

The listed species exposed through direct effects or indirect effects resulting from the proposed use of flurprimidol where turf grass and ornamentals are grown and conclusions are presented in **Table I-2**. As a result, this ecological risk assessment for use of flurprimidol on turf grasses and ornamentals indicates direct effects LOC exceedances for birds, terrestrial-phase amphibians, reptiles, mammals, and terrestrial and aquatic vascular plants. Therefore, there is a potential for indirect effects to listed animal and plant taxa that depend on those taxa directly at risk when exposed to flurprimidol as pollinators or seed dispersers, mammal or reptile burrows for habitat, feeding, or cover requirements, and for survival, growth, or reproduction.

1

Listed Taxon	Direct Effects from Acute Exposures	Direct Effects from Chronic Exposures	Indirect Effects
	Aquati	c	
Aquatic non-vascular plants	No	N/A	Yes
Aquatic vascular plants	Yes	N/A	Yes
Freshwater invertebrates	No	No	Yes
Marine/estuarine invertebrates	No	No	No
Freshwater fish	No	No	Yes
Marine/estuarine fish	No	No	No
Aquatic-phase amphibians	No	No	Yes
	Terrestr	ial	
Semi-aquatic plants - monocots	Yes	N/A	Yes
Semi-aquatic plants – dicots	Yes	N/A	Yes
Terrestrial plants - monocots	Yes	N/A	Yes
Terrestrial plants - dicots	Yes	N/A	Yes
Insects	No	N/A	Yes
Birds	No	Yes	Yes
Terrestrial-phase amphibians	No	Yes	Yes
Reptiles	No	Yes	Yes
Mammals	Yes	Yes	Yes

N/A - indicates that this exposure route is not assessed.

II. Problem Formulation

The purpose of this problem formulation is to provide the foundation for the ecological risk assessment being conducted for the proposed use of flurprimidol as a plant growth regulator on turf grasses and ornamentals. The problem formulation for flurprimidol articulates the purpose and objectives of the risk assessment, evaluates the nature of the problem, and provides a plan for analyzing the data and characterizing the risk (USEPA, 1998).

A. Stressor Source and Distribution

1. Nature of Stressor

This ecological risk assessment addresses the potential ecological risks associated with the proposed new uses of flurprimidol, a plant growth regulator, on turf grasses and ornamental plants grown nationwide. Given that turf grasses and ornamentals are grown across the country and there are currently no geographic restrictions on the proposed label, the potential market for this product is large. As a policy, when conducting an ecological risk assessment for new uses, EFED assumes that the stressor has the potential to be applied anywhere the turf grasses and ornamentals are grown and does not consider predicted sales, market trends, etc.

A summary of selected physical, chemical, and environmental fate properties of flurprimidol is presented in **Table II-1**. Overall, the dominant dissipation mechanism for flurprimidol is expected to be via leaching due to its mobile nature, plant uptake because the compound is a plant growth regulator that is taken up by the plant and by photolysis in aqueous systems. Flurprimidol is stable to hydrolysis and resistant to degradation in both aerobic and anaerobic terrestrial systems. Field dissipation data suggest that much more rapid dissipation was found that might be expected from the laboratory studies; however, the registrant postulates that this could be due to a number of factors not tracked in the study including plant uptake and volatilization. Consequently, given that when applied to bareground sites, flurprimidol was very persistent and because of the low volatility of this compound, it appears that plant uptake may be the dominant route of removal from the field.

The chemical structure of flurprimidol is shown in Figure 1.

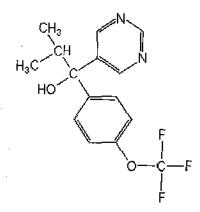


Figure 1. Flurprimidol Structure

Selected chemical and physical properties of flurprimidol are summarized below in Table II-1.

Table II-1. Summary of Chemical and Physical Properties of Flurprimidol

Water Solubility (20° C): 130 mg/L

Vapor Pressure (25° C): 3.64 x 10⁻⁷ mmHg

Octanol/water Partition Coefficient: 933

 (K_{ow})

3.00

Environmental Fate Properties

Hydrolysis $T_{1/2}$: Stable at pHs 5, 7, and 9

Aqueous Photolysis $T_{1/2}$: 1.4 days

Soil Photolysis $T_{1/2}$: No data

Aerobic Soil Metabolism $T_{1/2}$: 482 days

Aerobic Aquatic Metabolism $T_{1/2}$: No data

Soil Sorption Coefficient Koc: 268 to 535 mL/g_{OC}

 K_d : 0.12 to 4.9 mL/g

It should be noted that the carbon in the 1-position in the propane moiety (the carbinol C) is a chiral molecule. However, EFED has no records of the discussion of the stereo chemistry of the molecule or possible differences in environmental fate properties or ecotoxicity between isomers. Based upon the Confidential Statement of the Formula's silence on the chirality questions, EFED is assuming the technical flurprimidol is a racemic mixture, with two isomers being of equal activity

2. Mode of Action

Flurprimidol is a turf growth regulator, which reduces leaf blade length and stem internode elongation in turf grass. It also is a systemic landscape growth regulator which suppresses terminal growth in established woody ornamental and perennial ground covers. Growth regulation results from suppression of gibberellic acid biosynthesis.

3. Overview of Pesticide Usage

Flurprimidol is a plant growth regulator for use on turf grass in golf courses; on a variety of bedding, flowering, perennial, and woody landscape plants in nurseries, greenhouses, and shadehouses; and on trees and plants in forest, industrial, and rights-of-way areas. Uses include golf course turf, forest trees, ornamentals, and a variety of bedding, flowering, bulb crop, perennial, and woody landscape plants. The proposed product labels are adding athletic fields, commercial, municipal and residential turf to the current registration, including edging/banding applications for landscape beds, sidewalks, perimeter of lawns, curbs, parking lots, driveways, posts, mailboxes, building structures, gravestones, fences, and other similar areas.

Application information for current registered uses and proposed new uses for flurprimidol is summarized in **Table II-2**. Flurprimidol is formulated as a wettable powder (10% - 50% active ingredient), soluble/solid concentrate (99.3% a.i.), liquid (0.38% - 13.26% a.i.), liquid – ready to use (48.1% a.i.), granule (0.17% - 0.5% a.i.), and as well as impregnated (93.6% a.i.) on

granular fertilizer producing granular formulation products. Application equipment includes spreader, backpack sprayer, low-pressure hand wand, ground boom sprayer, injection equipment, by hand, drencher, drip irrigation, tank-type sprayer or sprinkler irrigation. Application is via foliar treatment, spot treatment, chemigation, tree injection or implant treatment, drench, edging treatment, or band treatment. Single application rates for treatment range from 0.26 to 3.0 pounds active ingredient/acre (lbs a.i./A) and seasonal application rates are up to 3.008 lbs a.i./A. Chemigation is not allowed in the States of New York and California.

The current registered uses and proposed new uses for flurprimidol are presented in Table II-2.

Table II-2. С	urrent Registered Use and	Proposed New		for Flurprim	idol	·
Uses	Product	Application Method	Maximum Single rate (lb ai/A)	Maximum yearly rate (lb ai/A)	Minimum # of Intervals	# of Applications per Season
	<u> </u>	Proposed	New Uses			
Turfgrasses	SP5075 Turf Grow	Broadcast (Spray)	0.26	3.0	2 weeks	[]
	Regulator ^{1,7}	Edge/Band (Spray)	0.69	3.0	8 weeks	4
		Broadcast (Granular)	0.75	3.0	3 weeks	. 4
Turfgrasses and Ornamentals	Turf Fertilizer Cutless ^{2,7}	Ornamentals (Granular)	1.0	3.0	2 months	3
		Spot Treatment (Granular)	3.0	3.0	3 weeks	1
Turfgrasses	Cutless 50W Turf Plant	Turf Grass (Spray)	0.75	3.0	2 weeks	4
	Regulator ^{3,7}	Edge/Band (Spray)	1.5	3.0	8 weeks	2
		Broadcast (Granular)	0.75	3.0	3 weeks	4
Turfgrasses	Cutless 0.33G Plant	Broadcast (Granular)	1.0	3.0	3 weeks	. 3
and Ornamentals	Growth Regulator ^{4,7}	Edge/Band (Granular)	1.5	3.0	8 weeks	2
		Ornamentals (Granular)	1.5	3.0	2 months	2
		Broadcast (Granular)	1.0	3.0	3 weeks	3
Turfgrasses	Turf Fertilizer Cutless ^{5,7}	Edge/Band (Granular)	1.5	3.0	8 weeks	2
		Ornamentals (Granular)	1.5	3,0	8 weeks	2
		Current Reg	istered Uses			
Woody Ornamentals	TopFlor Ornamental Plant Growth	Drench, Chemigation,	0.3626	80.1	5 days	3

Bulb Crops,	 				
Bedding					
Plants,					
Flowering &		0.145	0.435	5 days	3
Foliage		0.145	0,433	Juays	ا د
Potted Plants,	•]				ĺ
and Bedding	j	'			
Plant Plugs					

¹ 67690-46 SP5075, Turf Grow Regulator/EC (13.26 % ai); density = 1.10 lb ai/gallon; 0.00859 lb ai/fl. oz.

⁷ 67690-16 Cutless Technical

B. Receptors

Assessment endpoints are explicit expressions of the actual environmental value that is to be protected. Assessment endpoint selection is based on valued entities or ecological receptors, the ecosystems potentially at risk, pesticide migration pathways, and routes by which ecological receptors may be exposed to the stressor. Endpoints for baseline ecological risk assessments typically include survivorship and sublethal parameters for aquatic and terrestrial species that may be exposed to a given stressor. Although assessment endpoints typically focus on individual toxicity of surrogate species, depending on the magnitude of an effect it may be possible to make risk predictions regarding indirect effects on species in higher or lower trophic levels.

1. Aquatic Effects

The toxicity of flurprimidol to aquatic organisms and plants is assessed using acute and chronic laboratory studies submitted by the registrant to the Agency. With the recent submission of aquatic toxicity data with duckweed, fish early-life-stage study with fathead minnow, and life-cycle study with daphnids, the aquatic toxicity profile is updated (**Table IV-1**). In addition, freshwater fish acts as a surrogate for aquatic-phase amphibian when data are not available on amphibians.

2. Terrestrial Effects

The effect of flurprimidol to terrestrial organisms and plants is assessed from acute, subacute and chronic studies submitted by the registrant to the Agency. With the recent submission of terrestrial toxicity data on avian reproduction, seedling emergence, and vegetative vigor, the terrestrial toxicity profile is updated (**Table IV-2**). Also, birds act as surrogates for reptiles and terrestrial-phase amphibians when data on those species are not available.

3. Ecosystem at Risk

The terrestrial ecosystem typically at risk includes the treated area and areas adjacent to treated area that might receive spray drift, runoff, or wind-erosion of soil particles. Aquatic ecosystems

 $^{^{2}}$ 67690-19, Turf Fertilizer Cutless 0.5%/G (0.5 % ai); density = 0.005 lb ai/lb of product

³ 67690-15, Cutless 50W Turf Plant Regulator (50 % ai); density = 0.5 lb ai/lb of product

⁴67690-13, Cutless 0.33G Plant Growth Reg/G (0.33 % ai); density = 0.0033 lb ai/lb of product

⁵ 67690-44, Turf Fertilizer Cutless/G (0.17 % ai); density = 0.017 lb ai/lb of product

⁶ 67690-20, Topflor Omamental Plant Growth Regulator (0.38 % ai); density = 15 g ai/gallon of product

typically at risk include water bodies receiving runoff and/or drift from treated sites. Because flurprimidol has the potential to be used anywhere there are turfgrass and ornamentals, the ecosystems potentially at risk are national in scope.

C. Assessment Endpoints

Assessment endpoints are defined as "explicit expressions of the actual environmental value that is to be protected." Defining an assessment endpoint involves two steps: 1) identifying the valued attributes of the environment that are considered to be at risk; and 2) operationally defining the assessment endpoint in terms of an ecological entity (i.e., a community of fish and aquatic invertebrates) and its attributes (i.e., survival and reproduction). Therefore, selection of the assessment endpoints is based on valued entities (i.e., ecological receptors), the migration pathways of pesticides, and the routes by which ecological receptors are exposed to pesticide-related contamination. The selection of clearly defined assessment endpoints is important because they provide direction and boundaries in the risk assessment for addressing risk management issues of concern.

A summary of the assessment and measurement endpoints selected to characterize potential ecological risks associated with exposure to flurprimidol are summarized in **Table II-3**. The ecological relevance of selecting these assessment endpoints is as follows: 1) complete exposure pathways exist for these receptors, 2) the receptors may be potentially sensitive to pesticides in affected media and in residues on plants, seeds, and insects, and 3) the receptors could potentially inhabit areas where pesticides are applied or areas where runoff and/or drift may impact the sites.

This ecological risk assessment considers maximum application rates on vulnerable soils, maximum number of applications (as well as single applications), and minimum intervals between applications for representative uses to estimate exposure concentrations. Exposure scenarios are developed to evaluate potential risks to non-target wildlife and plant from flurprimidol treatments on turfgrasses and ornamentals. Six exposure scenarios were estimated for the proposed new uses of flurprimidol: four broadcast spray application at 0.75 lb a.i./A with a 2 week reapplication interval, twelve applications at 0.26 lb a.i./A with a 2 week intervals, five banded (6 inch bandwidth) spray application at 0.69 lb a.i./A, four broadcast application of granules at 0.75 lb a.i./A, one broadcast application of granules at 3.0 lb a.i./A, and two banded (6 inches) application of granules at 1.5 lb a.i./A.

This assessment is not intended to represent a site or time-specific analysis. Instead, this assessment is intended to represent high-end exposures at a national level. Likewise, the most sensitive toxicity endpoints are used from surrogate test species to estimate treatment-related direct effects on acute mortality and chronic reproductive, growth and survival assessment endpoints. Toxicity tests are intended to determine effects of pesticide exposure on birds, mammals, fish, terrestrial and aquatic invertebrates, and plants. These tests include short-term acute, subacute, and reproduction studies and are typically arranged in a hierarchical or tiered system that progresses from basic laboratory tests to applied field studies. The toxicity studies are used to evaluate the potential of a pesticide to cause adverse effects, to determine whether further testing is required, and to determine the need for precautionary label statements to

minimize the potential adverse effects to non-target animals and plants (40 CFR §158.202, 2002).

In order to protect threatened and endangered species, all assessment endpoints are measured at the individual level. Measuring endpoints at the individual level also provides insight about risks at higher levels of biological organization (e.g. population and communities). For example, pesticide effects on individual survivorship have important implications for both population growth increase and habitat carrying capacity.

Table II-3. Summary of Assessment Endpoints and Measures of Ecological Effects*							
Assessment F	Endpoint	Surrogate Species and Measures of Ecological Effect ¹	Measures of Exposure				
Birds ²	-Bobwhite quail acute oral LD ₅₀ Survival -Bobwhite quail and mallard duck subacute dietary LC ₅₀		Maximum residues on				
	Reproduction and growth	Bobwhite quail and mallard duck reproduction NOAEC	food items (foliar) • LD ₅₀ /sqft (granular				
Mammals	Reproduction and growth	Laboratory rat reproduction NOAEC and NOAEL	ingestion)				
	Survival	Laboratory rat acute oral LD ₅₀					
Freshwater fish ³	Survival	Rainbow trout and bluegill sunfish acute LC50	Peak EEC ⁴				
riesijwajei listi	Reproduction and growth	Freshwater fish reproduction NOAEC	60-day average EEC4				
Freshwater	Survival	Water flea acute EC50	Peak EEC⁴				
invertebrates	Reproduction and growth	Water flea reproduction NOAEC	21-day average EEC ⁴				
Estuarine/marine fish	Survival	Sheepshead minnow acute LC ₅₀ (study not required at this time)	Peak EEC ⁴				
Estuarine/marine invertebrates	Survival	Eastern oyster acute EC ₅₀ and mysid acute LC ₅₀ (study not required at this time)	Peak EEC ⁴				
Terrestrial plants ⁵	Survival and growth	Monocot and dicot seedling emergence and vegetative vigor EC ₂₅ and NOAEC values	Estimates of runoff and spray drift to non-target areas				
Insects	Survival (not quantitatively assessed)	Honeybee acute contact LD ₅₀	Maximum application rate				
Soil-dwelling invertebrates	Survival	Earthworm acute LC50	Soil EEC				
Aquatic plants and Survival and algae growth		Algal (green algae) and vascular plant (duckweed) EC ₅₀ and NOAEC values for growth rate and biomass measurements	Peak EEC⁴				

Table II-3. Summary of Assessment Endpoints and Measures of Ecological Effects*					
Assessment Endpoint	Surrogate Species and Measures of Ecological Effect ¹	Measures of Exposure			

¹ If species listed in this table represent most commonly encountered species from submitted studies, risk assessment guidance indicates most sensitive species tested within taxonomic group are to be used for baseline risk assessments.
² Birds represent surrogates for amphibians (terrestrial phase) and reptiles.

³ Freshwater fish may be surrogates for amphibians (aquatic phase).

D. Conceptual Model

1. Risk Hypotheses

Risk hypotheses are specific assumptions about potential adverse effects (i.e., changes in assessment endpoints) and may be based on theory and logic, empirical data, mathematical models, or probability models (USEPA, 1998). For this assessment, the risk is stressor-linked, where the stressor is the release of flutriafol to the environment. The following risk hypothesis is presumed for this baseline assessment.

The use of flurprimidol as a plant growth regulator for terrestrial and residential outdoor uses will result in exposure to terrestrial and aquatic animals and plants. Based on the persistence and mobility of flurprimidol, the mode of action, the application methods, and food-web of the target terrestrial ecosystems, flurprimidol has the potential to cause reduced survival, and reproductive and growth impairments for both terrestrial and aquatic animals and plant species.

2. Conceptual Model Diagram

The conceptual model is used to depict the potential routes of exposure from flurprimidol when used as a plant growth regulator on turfgrasses and ornamentals in terrestrial and residential outdoor settings. All potential routes of exposure are considered and presented in the conceptual model (Figures 2 and 3 for terrestrial and aquatic ecosystems, respectively). The conceptual model generically depicts the potential source of flurprimidol, release mechanisms, abiotic receiving media, biological receptor types, and effects endpoints of potential concern.

In order for a chemical to pose an ecological risk, it must reach ecological receptors in biologically significant concentrations. An exposure pathway is the means by which a contaminant moves in the environment from a source to an ecological receptor. For an ecological exposure pathway to be complete, it must have a source, an environmental transport medium, a point of exposure for ecological receptors, and a feasible route of exposure. The assessment of ecological exposure pathways, therefore, includes an examination of the source and potential migration pathways for constituents, and the determination of potential exposure routes (e.g., ingestion, inhalation, dermal contact).

⁴ Based on GENEEC2 and PRZM/EXAMS estimates of aquatic EECs.

⁵ Four species of two families of monocots - one is com, six species of at least four dicot families, of which one is soybeans.

^{*} $\dot{L}D_{50}$ = Lethal dose to 50% of the test population; NOAEC = No observed adverse effect concentration; LOAEC = Lowest observed adverse effect concentration; LC_{50} = Lethal concentration to 50% of the test population; EC_{50}/EC_{25} = Effect concentration to 50%/25% of the test population.

Potential exposure pathways by which flurprimidol may inadvertently affect non-target plant and animal populations in aquatic areas are drift (from spray application) and runoff/leaching of contaminated water from treated areas to untreated areas. In terrestrial areas, the exposure routes are drift (from spray application), runoff events (off-site movement of contaminated water), leaching, wind erosion of contaminated soil particles, and direct ingestion of granules, aquatic animals, and earthworms. There may be exposure to non-target terrestrial plants adjacent to treated areas via drift and runoff from transitional sites or wetlands that may be dry during certain periods, or via wind-blown treated soil particles from those pathways for aquatic species. Exposure through aquatic media will mainly be to the parent compound since flurprimidol is persistent in the environment.

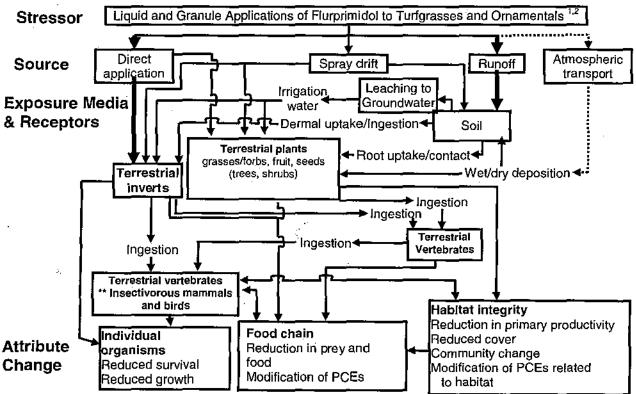


Figure 2, Terrestrial Environmental Risk Conceptual Model

** Route of exposure includes only ingestion of terrestrial invertebrates

2 - Spray drift and atmospheric transport is not a concern for granule applications

£.

^{1 -} Dashed line represents unlikely exposure pathways; bold line represents likely exposure pathways

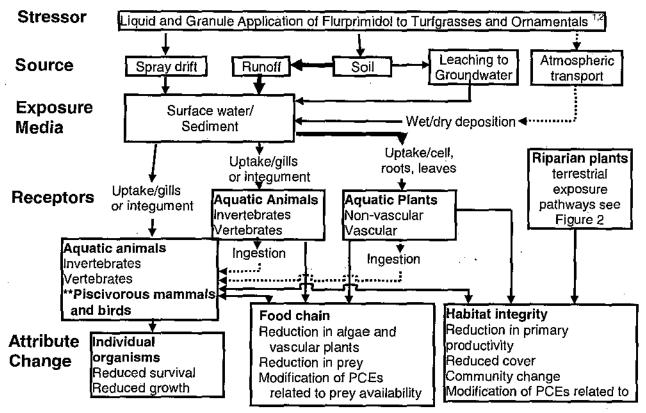


Figure 3. Aquatic Environmental Risk Assessment

- ** Route of exposure includes only ingestion of fish and aquatic invertebrates
- 1- Dashed line represents unlikely exposure pathways; bolded line represents likely exposure pathways
- 2 Spray drift and atmospheric transport is not a concern for granule applications

E. Analysis Plan

In order to address the risk hypothesis, the potential for adverse effects on non-target aquatic and terrestrial animals and plants is estimated. In the following sections, the use, environmental fate, and ecological effects of flurprimidol are characterized and integrated to assess the risks. This is accomplished using risk indices (ratio of exposure concentration to effects concentration) approach. Although risk is often defined as the likelihood and magnitude of adverse ecological effects, the risk quotient- and LD₅₀ per square foot-based approaches do not provide a quantitative estimate of likelihood and/or magnitude of an adverse effect. Such estimates may be possible through a more refined, probabilistic assessment; however, they are beyond the scope of this baseline assessment. This analysis provides the basis for estimating and describing risks, identifying uncertainties in the risk hypothesis, and recommendations for new data collection if needed to fill the data gaps.

This assessment only considers the potential effects of the exposure as a result of the currently proposed uses. The Agency does not routinely include an evaluation of mixtures of active ingredients, either those mixtures of multiple active ingredients in product formulations or those in the applicator's tank. In the case of the product formulations of active ingredients (that is, a

registered product containing more than one active ingredient), each active ingredient is subject to an individual risk assessment for regulatory decision regarding the active ingredient on a particular use site. If effects data are available for a formulated product containing the active ingredient, they may be used qualitatively or quantitatively in accordance with the Agency's Overview Document and the Services' Evaluation Memorandum (USEPA 2004; USFWS/NMFS 2004).

For this baseline ecological risk assessment, estimated environmental concentrations (EECs) for aquatic and terrestrial systems were calculated using exposure scenarios for turfgrasses and ornamental use according to label information. EECs were calculated using T-REX (version 1.4.1) and GENEEC2 (version 2.0) (USEPA, 2001) and linked PRZM (Suarez, 2006) and EXAMS (Burns, 2004) models. Baseline terrestrial and aquatic concentrations represent values for a representative use grown in a generic location which have been chosen to represent all uses. EECs, and the resulting risk quotients from the TerrPlant model (version 1.2.2) for terrestrial plants growing in dry and semi-aquatic environments, are generated by using the seedling emergence and vegetative vigor toxicity information at the maximum proposed application rate. In addition, because flurprimidol has a low potential to bioaccumulate as demonstrated by its relatively low K_{ow} and low BCF factors in bluegill sunfish, the KABAM model is excluded from the assessment since minimum exposure is expected for piscivorous birds and mammals from ingesting bioconcentrated aquatic organisms with flurprimidol residues.

Also, EFED has no standard methodology for assessing chronic risk to terrestrial animals from ingesting granules. In order to estimate chronic risks for terrestrial animals, the estimate of flurprimidol concentrations accumulated in the tissues of earthworms was used to assess the chronic exposure estimates for terrestrial animals. Then, the earthworm residues (mg/kg-soil) are compared to terrestrial animal NOAEC values (mg a.i./kg) to estimate the potential for chronic risk to birds or mammals associated with direct ingestion of earthworms. This analysis assumes that 100% of the diet that birds and mammals consume is comprised of terrestrial soil invertebrates. However, it is unclear whether other routes of granular flurprimidol exposure (i.e., direct consumption of granules, ingestion of granules that adhere to soil invertebrates, partitioning of dissolved flurprimidol to on-site sources of wildlife drinking water, dermal exposure of granules released to surrounding soil, and on-site puddles) or combined routes of exposure would result in chronic risk concerns for birds.

1. Identification of Data Gaps

The environmental fate and ecological toxicity databases for flurprimidol are essentially complete. With the recent submission of new studies, the available data are generally sufficient for risk assessment purposes of the parent compound.

There are no toxicity studies with estuarine/marine organisms available; however, it was agreed that the studies are not requested at this time by the Agency due to minimal risk to their freshwater counterparts. Also, there are no acute toxicity data for passerine birds; however, the Agency is not requiring the studies at this time because both acute oral studies with bobwhite quail and mallard duck did not observe any mortality or sublethal effects; thus, it s likely for passerine birds to have similar results with the quail and duck.

2. Measures of Exposure

Aquatic Animals and Plants

Tier I and Tier II models were used to estimate flurprimidol concentrations in aquatic environment.

The Tier I simulation model GENEEC2 (Version 2.0; USEPA, 2001) is used to generate estimated environmental concentrations (EECs) of the active ingredient that are not expected to be exceeded 90% of the time in surface water bodies adjacent to application sites. The predicted peak, 21-day, and 60-day concentrations are used to estimate acute and chronic risks to aquatic animals inhabiting shallow-water aquatic communities that receive runoff during rainfall events and/or drift of the active ingredient from adjacent use sites.

GENEEC2 assumes application of the active ingredient to a 10-hectare agricultural field, planted solely in a generic crop, that drains into an adjacent 1-hectare water body, 2 meters deep (20,000 m³ volume) with no outlet. This generic agricultural scenario is representative of flutriafol use on apples and soybeans, and is likely to result in conservative estimates of exposure. GENEEC2 considers adsorption of the active ingredient to soil or sediment, direct deposition of spray drift into the water body, and degradation of the pesticide in soil before runoff and within the water body. It is a single event model, meaning that it assumes one single large rainfall/runoff event from a standard size field to a standard size ecological pond.

The Tier II models were also used to predict aquatic EECs for aquatic plant exposure assessment. The Tier II models used are the Pesticide Root Zone Model (PRZM; Suarez, 2006) coupled with the Exposure Analysis Model System (EXAMS; Burns, 2004). These models are parameterized using relevant reviewed registrant-submitted environmental fate data.

PRZM (v3.12.2) and EXAMS (v2.98.4.6) are screening simulation models coupled with the input shell PE5.pl (Aug 2007) to generate daily exposures and 1-in-10 year EECs of flurprimidol that may occur in surface water bodies adjacent to application sites receiving flurprimidol through runoff and spray drift. PRZM simulates pesticide application, movement and transformation on an agricultural field and the resultant pesticide loadings to a receiving water body via runoff, erosion and spray drift. EXAMS simulates the fate of the pesticide and resulting concentrations in the water body. The standard scenario used for ecological pesticide assessments assumes application to a 10-hectare agricultural field that drains into an adjacent 1-hectare water body, 2-meters deep (20,000 m³ volume) with no outlet. PRZM/EXAMS was used to estimate screening-level exposure of aquatic organisms to flurprimidol. The measure of exposure for aquatic species is the 1-in-10 year return peak or rolling mean concentration. The 1-in-10 year peak is used for estimating acute exposures of direct effects to aquatic plants.

Terrestrial Animals and Plants

The potential exposure pathways for terrestrial plants and animals include deposition from spray applications, runoff/leaching from treated areas, spray drift, and wind erosion of soil particles

resulting in residues on non-target species as well as residues on food items and granules for non-target species. As part of the terrestrial assessment, EFED used the models T-REX (ver. 1.3.1.; USEPA, 2001), earthworm fugacity model, and TerrPlant (ver. 1.2.2; USEPA, 2006) to estimate exposure concentrations of flutriafol to non-target birds, mammals and plants.

T-REX assumes application of the active ingredient to a one-acre agricultural field that settles on food items of avian and mammalian species (short and tall grass, broadleaf forage, large and small insects, fruits, pods, and seeds) and granules with flurprimidol residues within the field. The earthworm fugacity model assumes concentrations of flurprimidol in earthworm tissues. TerrPlant assumes application of the active ingredient to a one-acre agricultural field that drifts and/or is subject to runoff off site to adjacent fields of non-target plants.

For soil-dwelling invertebrates, soil EECs are estimated by converting the application rate of lb/A to mg/kg soil, using a soil density of 1.3 g/cm³.

3. Measures of Effect

Measures of effect are obtained from a suite of registrant-submitted guideline studies which were conducted with a limited number of surrogate species (**Tables II-4 and II-3**). The test species are not intended to be representative of the most sensitive species but rather were selected based on their ability to thrive under laboratory conditions. Toxicity testing reported in this risk assessment utilizes surrogate species to represent all freshwater fish (2000+) and bird (680+) species in the U.S.

The acute measures of effect used in this baseline assessment are the median lethal dose (LD₅₀), median lethal concentration (LC₅₀) or the median effect concentration (EC₅₀). These are measures of acute toxicity which result in 50% of the respective effect in tested organisms. The endpoints for chronic measures of effect are the No Observed Adverse Effects Concentration (NOAEC) and the No Observed Adverse Effects Level (NOAEL). The measurement endpoints used for risk characterization were derived from studies which underwent review and were classified as "acceptable" (conducted under guideline conditions and considered to be scientifically sound) or "supplemental" (conditions deviated from guidelines but the results are scientifically sound).

4. Integration of Exposure and Effects

Available exposure and toxicity data are compared in order to evaluate the risks of adverse ecological effects on non-target species. For this baseline assessment, the risk indices (RQ and LD₅₀/ft²) are used to compare exposure and toxicity values. The risk indices involve dividing EECs by acute and chronic toxicity values. The resulting RQs and LD₅₀/ft²s are then compared to the Agency's levels of concern (LOCs) (USEPA, 2004). These criteria are used to indicate if applications of flurprimidol, as directed on the label, have the potential to cause adverse effects to non-target organisms. Although risk is often defined as the likelihood and magnitude of adverse effects, the risk quotient-based approach does not provide a quantitative estimate of likelihood and/or magnitude of an adverse effect, but rather provides a "yes" or "no" answer depending upon whether or not LOCs are exceeded.

LOCs currently address the following risk presumption categories: (1) acute risk – when a risk index is greater than the LOC of 0.5 to animals, (2) acute restricted use – when a risk index is greater than the LOC of 0.2 and 0.1 for terrestrial and aquatic animals, respectively, (3) acute endangered species – when a risk index is greater than the LOC of 0.1 and 0.05 for terrestrial and aquatic animals, respectively, (4) chronic risk – when a risk index is greater than the LOC of 1.0 to animals, and (5) non-listed and listed plant risk – when a risk index is greater than the LOC of 1.0 to plants.

III. ANALYSIS

A. Use Characterization

This risk assessment focuses exclusively on the use patterns of flurprimidol as a plant growth regulator on turfgrasses and ornamentals. Use patterns tabulated in **Table III-1** below serve as the basis for selecting the appropriate application rates and methods used as part of the input parameters needed to obtain EECs with simulation models.

Table III-1. Flurprimidol Application Information							
Formulation	Method of Application	Maximum Application Rate Ib a.i./A	Maximum Number of Applications (Interval)	Maximum Seasonal Use Rate lb a.j./A			
Broadcast Foliar Spray	Ground	0.26	12 applications (14-day interval)	3.08			
Broadcast Foliar Spray	Ground	0.75	4 applications (14-day interval)	3.08			
Banded Foliar Spray	Ground	0.69	5 applications (56-day interval)	3.08			
Broadcast Granular	Ground	0.75	4 applications (21-day interval)	3.08			
Banded Granular	Ground	1.5	2 applications (56-day interval)	3.08			
Broadcast Granular	Ground	3.0	1 application	3.08			

B. Exposure Characterization

1. Environmental Fate and Transport Characterization

Overall, the dominant dissipation mechanism for flurprimidol is expected to be via leaching due to its mobile nature, plant uptake because the compound is a plant growth regulator that is taken up by the plant, and by photolysis in aqueous systems. Flurprimidol is stable to hydrolysis and resistant to degradation in both aerobic and anaerobic terrestrial systems. Field dissipation data for cropped turf plots suggest that much more rapid dissipation was found that might be expected from the laboratory studies; however, the registrant postulates that this could be due to a number of factors not tracked in the study including plant uptake and volatilization. Field dissipation data on bareground sites yields much longer dissipation times comparable to laboratory estimates

which suggest that the presence of plant material is influencing the dissipation in the field. No data was available to suggest how available flurprimidol is in plant residues and how flurprimidol residues in this compartment might influence overall exposures. Finally, flurprimidol is not expected to be volatile, has a moderate solubility in water, and a low potential to bioaccumulate as demonstrated by its relatively low K_{ow} and low BCF factors in bluegill sunfish.

In an acceptable hydrolysis study (MRID 00117921), flurprimidol was studied in three solutions buffered at pH5, pH7, and pH9 at a test concentration of 1 ppm. The solutions were incubated in the dark at 25°C and sampled for 31 days. Flurprimidol was stable to hydrolysis under all three test conditions.

An initial aqueous photolysis study (MRIDs 00142917; 40401006) was submitted for flurprimidol. However, these studies were rejected due to concerns about the nature of the artificial light source, the inability to control volatilization, and poor recoveries. The registrant responded to these concerns (MRID 40858503) however, the additional data did not change the conclusions and the study was deemed unacceptable. In response, the registrant submitted a new aqueous photolysis study (MRID 00117922) which provided supplemental data. The study was classified as supplemental because a material balance was not provided, degradates were not identified, the artificial light source was not compared to natural light, and the test solutions were not buffered. However, the study did provide supplemental data which indicates that flurprimidol applied at 1 ppm to an unbuffered aqueous solution at pH of 7.1 degraded rapidly with a half life of 3 to 4 hours. Subsequently, the registrant submitted a new study (MRID 41228001) in which the aqueous photolysis half life of flurprimidol was found to be 1.4 days in a pH solution of 7 at 25°C and sampled for 5 days. Material balance ranged from 97% to 102% and there were six photodegradates detected. Two of the degradation products achieved totals of greater than 10% of the applied but were not identified.

In an acceptable aerobic soil metabolism study (MRID 00117918), flurprimidol was studied in sandy loam, silt loam, and clay loam incubated at 75% of 0.33 bar at 20-25°C and sampled for 26 weeks. Regression analysis suggests a half life of 68.8 weeks; however, this value is suspect because it is extrapolated beyond the end of the study. Analysis revealed that over 30 degradation products were formed but none of these by-products exceeded 2% of applied. At 26 weeks post treatment, degradates totaled 12.6-19.4% of applied radioactivity in soil, and 3.4-4.4% were unextractable.

In an anaerobic soil metabolism study (MRID 40858504), flurprimidol was found to be extremely stable under anaerobic soil conditions. Flurprimidol was studied at 3 ppm in sandy loam, silt loam, and clay loam soils that were incubated for 8 weeks under flooded anaerobic conditions in the dark following 4 weeks of aerobic conditioning. In the three soils, flurprimidol comprised 91% to 93% of the recovered radioactivity immediately prior to the establishment of anaerobic conditions. Flurprimidol also accounted for roughly 90% of the radioactivity present after 4 weeks and 8 weeks of anaerobic conditions and is therefore considered stable to anaerobic metabolism. Material balances ranged from 93% to 103% prior to establishing anaerobic conditions.

Transformation Products

Because of the resistance of flurprimidol to degradation by hydrolysis and soil metabolism, information on transformation products of flurprimidol is limited. In an aqueous photolysis study (MRID 41228001), flurprimidol degraded readily with a half-life of 1.4 days. Six photodegradates were detected, with two of the photoproducts formed at greater than 10% of the applied radioactivity; the photoproducts were simple rearrangements where the pyrimidine ring being substituted either ortho or meta onto the phenoxy ring.

In an acceptable adsorption/desorption study (MRID 00142919), flurprimidol was studied using both batch equilibrium and aged leaching column methods. In the batch equilibrium portion of the study, flurprimidol was applied at 0.20 to 25 µg/ml in two sand soils, three sandy loam soils, one clay loam soil, and two loam soils. Freundlich K_d values ranged from 0.12 to 4.9 while Koc values ranged fro 140 to 535 with corresponding 1/N values of 0.737 to 0.904. At 0.2 to 800 μg/ml, flurprimidol was mobile with Freundlich K_d values of 2.56 in a sandy loam soil and 9.35 mL/g in a loam soil with corresponding K_{oc} values of 369 and 404 mL/g_{oc}. Flurprimidol was also studied in both aged and unaged leaching columns. The aged leaching column study was not considered acceptable because the incubation period of 7 days was not considered sufficient. In the unaged study, between 0.74% and 1.04% of applied flurprimidol was found in the leachate. An additional supplemental study (MRID 00117919) was submitted which provided data on the potential adsorption/desorption of flurprimidol. Flurprimidol applied at 0.0142 to 1.68 g/ml was studied in a single sandy loam soil and found to have a Freundlich K_d of 1.7 mL/g. Finally, an additional supplemental aged leaching study (MRID 00117920) was submitted which indicated that flurprimidol residues in soil aged for 30 days on sandy loam indicated 7.3% of radioactivity was present in leachate. The study was classified as supplemental because degradates were not analyzed for in this study.

In an acceptable terrestrial field dissipation study (MRID 40184403) flurprimidol dissipation was studied on turf covered sites in Florida, Tennessee, and Indiana. Flurprimidol was applied at between 0.75 and 1.5 lbs a.i./acre and degraded from the upper 6 inches (soil, thatch, and grass) with half lives between 5 and 23 days. Flurprimidol was not detected in the 6 to 12 inch or 12 to 18 inch depths and was below the detection limit (0.01 ppm) in the control plots. Flurprimidol did not degrade during transport with recoveries between 102% and 116% of the fortified amount. Flurprimidol was stable to storage for 3 months with greater than 96% remaining in frozen samples, however did degrade to 77% after 9 months. Reportedly, all field samples were analyzed within two months of collection. The registrants suggest that the rapid dissipation of flurprimidol from the sites was due to a combination of factors including uptake, metabolism, photolysis, microbial degradation and possibly volatilization.

In a supplemental soil dissipation study (MRID 40401007), flurprimidol was applied to a bareground sites in Indiana and Mississippi at 1.75 lbs a.i./acre. At the Indiana site, flurprimidol dissipated with a half life of approximately 9 months in the 0 to 3 inch depth with a calculated (regression analysis) half life of 80.6 weeks was calculated although this value is suspect because it exceeds the duration of the study (which was terminated at 37 weeks due to destruction of the site). At the Mississippi site, flurprimidol dissipated with an approximate half life of 4 to 9 months. The purpose of the study was to determine if flurprimidol was likely to leach and the

data suggest that the compound has a moderate potential to leach when applied to bare soil. The results of this study, viewed in conjunction with the results of the previous field dissipation study (MRID 40401007) suggest that the presence of plants in the field will drive the removal of flurprimidol from soil. However, what is not clear from the results of these studies is how much flurprimidol remains in the plant and what effect incomplete plant coverage might have on dissipation in the field.

In an acceptable bioconcentration factor study (MRID 40401001) flurprimidol was found to 19.3x in edible tissues, 52.3x in nonedible tissues, and 6.2x in whole fish. Specifically, juvenile bluegill sunfish were exposed to flurprimidol at 0.425 ppm for 28 days under flow-through conditions. Maximum mean residue levels were 8.2 ppm in edible tissues, 22.4 ppm in nonedible tissues, and 14.9 ppm in the whole fish. After 28 days of exposure, flurprimidol comprised 52% and 55% of total radioactivity in the edible and nonedible tissues respectively. Two major degradates identified were approximately 20% of applied. Several minor degradates were also detected. Water concentrations ranged from 0.410 ppm to 0.455 ppm. After 16 days of depuration, flurprimidol residues were 0.05 ppm in edible tissues, 0.15 ppm in nonedible tissues, and 0.09 ppm in the whole fish

Parameter	Value			f Flurprimidol Reference/Comments
			D.,	
	elected Physical			
Vapor pressure (25 °C)	3.64 x	10-7 mm H	<u>g</u>	00162772
log K _{ow}		2.96		40401001
	Per	sistence		
Hydrolysis t _{1/2}				•
pH 5	pH-	5 - stable		
рН 7	pH '	7 - stable		
pH 9	pН	9 - stable		00117921
Photolysis t _{1/2} in water	1,	4 days		00142917, 40401006, 40858503, 41228001, 00117922
Photolysis t _{1/2} on soil	N	o data		
Soil metabolism aerobic t _{1/2} 24–25°C	48	32 days		00117918
Soil metabolism anaerobic t _{1/2}	-	stable		40858504
Aquatic metabolism aerobic t _{1/2}	N	o data		
Aquatic metabolism anaerobic $t_{1/2}$	N	o data		
	Mobility/Adso	rption-Des	orption	
Batch equilibrium – unaged	Soil Textural Classification	Kd	Koc	00142919, 00117919. 00117920
	sand	3.09	535	
	sandy loam	1.86	268	

Summary of Environmental Chemistry and Fate Properties of Flurprimidol					
Parameter	Value			Reference/Comments	
	loam	3.11	283		
	clay loam	4.77	266		
	loam	4.9	212		
	sandy loam	0.89	140		
	sand	0.12	208		
	sandy loam	3.46	333		
Laboratory volatility		NA		. NA	
	Field I	Dissipation	!		
Terrestrial field dissipation		5 to 23 days-cropped 80 weeks-bare soil		40184403 40401007	
Aquatic field dissipation		NA		NA	
·	Bioaca	cumulation	!		
Accumulation in fish, maximum BCF	52.3x - no	edible tissu medible tis	sues		
-77	6.2x -	whole fish	1	40401001	

2. Measures of Aquatic Exposure

Aquatic exposure modeling follows a tiered approach in order to efficiently allocate resources to assessment efforts of varying complexities. Tier I aquatic exposure modeling aims to provide an upper-bound (or high-end) Estimated Environmental Concentration (EEC) by modeling a site that is highly vulnerable to runoff or leaching. Consequently, if these conservative EECs yield risk quotients that fall below the Agency's Level of Concern (LOC) for aquatic organisms, actual risk to aquatic organisms may be unlikely. If a Tier I EEC yields a risk quotient higher than an LOC, the assessment must be refined to be more reflective of actual use site conditions.

a. GENEEC2 Exposure Modeling

Tier I aquatic exposure modeling relies on GENEEC2¹ (Generic Estimated Environmental Concentration) (USEPA, 2001), a screening model that is non-specific to crop and use-site. The model estimates upper-bound pesticide exposure in surface water using basic chemical properties, proposed application rates and methods, adsorption of the pesticide to soil or sediment, direct deposition of spray drift into the water body, and degradation of the pesticide in soil before runoff and within the water body. The GENEEC2 model estimates upper-bound pesticide surface water concentrations in a generic farm pond scenario by incorporating the following conservative assumptions:

- Input values for application rate and number of applications are the labeled maxima.
- The entire watershed is cropped and treated with the pesticide, and the 10-hectare watershed area is high relative to the 20,000-liter volume of the water body.

¹ http://www.epa.gov/oppefed1/models/water/index.htm.

- There is no buffer between the pond and the treated field.
- Runoff is a 6-inch rainfall event over a 24-hour period.
- The geographic location of use is representative of high-end potential for pesticide runoff and is not necessarily representative of runoff conditions for the labeled use.

EFED has developed a tiered approach for modeling aquatic exposures. This tiered system is designed to minimize the amount of analysis which is required to evaluate any given chemical. Each of the tiers is designed to screen out pesticides by requiring higher, more complex levels of investigation only for those that have not passed the previous tier. Each tier screens out a percentage of pesticides from having to undergo a more rigorous pre-registration review. 'Passing' a given assessment tier indicates that there is a low possibility of risk to the aquatic environment. 'Failing' an assessment tier, however, does not mean the chemical is likely to cause environmental problems, but that the assessment should continue on to the next higher assessment tier. The end result of this tiered modeling system will ideally be as thorough an analysis as is necessary for each pesticide and will focus greatest resources and efforts toward areas of greatest potential ecological threat. OPP does not take significant regulatory action based upon the results of screening models.

For flurprimidol, EFED has conducted a Tier I screening level modeling effort (Appendix A). In doing so, EFED has relied on the GENeric Estimated Exposure Concentration model version 2 (GENEEC2) to estimate flurprimidol concentrations in surface water. GENEEC2 was designed to mimic a much more sophisticated PRZM/EXAMS simulation but requires far fewer inputs and much less time and effort to use. The model uses a candidate chemical's basic use and application information, its soil/water partition data and its degradation rate values to estimate high level exposure values in the same EFED "standard" agricultural field/farm pond scenario as used with PRZM/EXAMS simulations. The program is generic in that it does not consider differences in climate, soils, topography or crop in estimating potential pesticide exposure.

GENEEC2 is also simpler in its treatment of hydrology. The linked PRZM and EXAMS models simulate the impact of daily weather on the treated agricultural field over a period of thirty-six years. During this time, pesticide is washed-off of the field into the water-body by twenty to forty rainfall/runoff events per year. Each new addition of pesticide to the water-body adds to the pesticide which has arrived earlier either through previous runoff events or through spray-drift and begins degradation on the day it reaches the water. GENEEC2, one the other hand, is a single event model. It assumes one single large rainfall/runoff event occurs and removes a large quantity of pesticide from the field to the water all at one time. Longer-term, multiple-day average concentration values are calculated based on the peak day value and subsequent values considering degradation processes.

Exposure concentrations of flurprimidol in aquatic ecosystem assessments were estimated using the Tier I GENEEC2 model. Model input parameters were selected according to standard input guidance and are tabulated in **Table III-2**.

Table III-2. GENEEC2 Input Parameters for Flurprimidol for Aquatic Ecological Exposure Assessment					
Model Parameter	Value	Comments ¹	Source		
Application Information	- See Table III-1	•	Product Labels		
Spray Drift by Scenario	ground - 1%; granular - 0%	Default Assumption			
Aerobic Soil Metabolism (t ½)	1444 days ¹	3 x a single aerobic soil metabolism half life of 482 days	MRID 00117918		
Aerobic Aquatic Degradation (t 1/2)	Stable ¹	no data			
Aqueous Photolysis (t 1/2)	1.4 days	single value	MRID 00142917, 40401006, 40858503, 41228001, 00117922		
Hydrolysis	pH 7 - stable		MRID 00117921		
Kd	2.78 mL/g	average K _d	MRID 00142919, 00117919, 00117920		
Water Solubility	130 mg/L		Product Chemistry		

¹ USEPA. 2009. Guidance for Selecting Input Parameters in Modeling the Environmental Fate and Transport of Pesticides, Version 2.1.

b. GENEEC2-Modeling Results

Aquatic EECs generated from GENEEC2 for the labeled uses of flurprimidol on terrestrial outdoor and residential sites are listed in **Table III-3**. These results represent peak and 4-, 21-, 60-, and 90-day average estimates of surface water concentrations in the standard farm pond for use as acute and chronic exposure endpoints. The results for the maximum exposure scenarios, appropriate for use in calculating baseline risk quotients, are presented in bold; other values are provided for characterization purposes. Model output files for these estimates are in **Appendix A**.

Table III-3. Estimated Aquatic Exposures of Flurprimidol in Surface Water Estimated Using GENEEC2								
Стор	Rate (lbs a.i./A)	No. of Apps.	Minimum Interval (days)	Peak (µg a.i./L)	21-Day Average (µg a.i./L)	60-Day Average (μg a.i./L)		
	0.26a -Spray	12	14	127.64	123.73	116.56		
	0.69 ^b -Spray	5	56	138.32	134.08	126.31		
Turfgrasses and	0.75 -Spray	4	14	126.97	123.08	115.96		
Ornamentals	0.75 – Granular	4	21	116.99	113.34	106.71		
	1.5- Granular	2	56	117.19	113.53	106.89		
	3.0 –Granular	1	N/A	118.76	115.06	108.33		

^aTwelve applications at 0.26 lb a.i./A exceeds the annual label limit of 3.08 lb a.i./A per year.

^b Five applications at 0.69 lb a.i./A exceeds the annual label limit of 3.08 lb a.i./A per year.

c. PRZM/EXAMS Exposure Modeling

Tier II PRZM/EXAMS² modeling was conducted to address aquatic exposure issues for aquatic vascular plants. Input parameters for PRZM/EXAMS modeling are shown in **Table III-4**. These results represent the 1 in 10 year peak and 4-, 21-, 60-, and 90-day average estimates of surface water concentrations in the standard farm pond for use as acute and chronic exposure endpoints.

Fate Property	Input Value	Comments	MRID (or source)	
Molecular Weight	312.3 g/mol		Product Chemistry	
Aqueous Solubility	130 mg/L		Product Chemistry	
Aqueous Photolysis Half-Life	1.4 days		00142917, 40401006, 40858503, 41228001, 00117922	
Vapor pressure (25 °C)	3.64 x 10 ⁻⁷ mm Hg		00162772	
Aerobic Soil Metabolism Half-Life	1444 days	3 x a single aerobic soil metabolism half life of 482 days ¹	00117918	
Hydrolysis Half-Life	Stable		00117921	
Aerobic Aquatic Metabolism Half-Life	Stable	No data	USEPA, 2009 ¹	
Anaerobic Aquatic Metabolism	Stable	No data	USEPA, 2009	
K _d	2.78 mL/g	Average K _d	00142919, 00117919, 00117920	

¹ USEPA. 2009. Guidance for Selecting Input Parameters in Modeling the Environmental Fate and Transport of Pesticides, Version 2.1.

d. PRZM/EXAMS Modeling Results

Aquatic EECs generated from PRZM/EXAMS for the labeled uses of flurprimidol on terrestrial outdoor and residential sites are listed in **Table III-5**. PRZM/EXAMS models provide a 1-in-10 year peak and 4-, 21-, 60-, and 90-day average estimates of surface water concentrations in the standard farm pond for use as acute and chronic exposure endpoints. However, because RQs for aquatic plants are based on the aquatic plant toxicity and peak EECs, only the peak EECs are tabulated in **Table III-5**. Model output files for these estimates are in **Appendix B**.

² http://www.epa.gov/oppefed1/models/water/index.htm.

Table III-5. Scenario, Date of First Application, Application Rate, Number of Applications, Reapplication Interval, Formulations, and Peak EECs Considered in Limit PRZM/EXAMS Modeling.

Scenario – State Use Site	Date of 1st application (month-day)	Application Rate (lb al/ac)	No. of Applications	Reapplication Interval	Formulation ¹ (CAM) ²	Peak EEC (μg a.i./L)
FL Nursery	08-08	3.00	1	n/a	Granular (1)	74.94
MI Nursery	03-08	3.00	1	n/a	Granular (1)	29.19
MI Nursery	03-08	1.50	2	60	Granular (1)	41.40
NJ Nursery	03-07	0.75	4.	21	Ground Spray (2)	40.83
NJ Nursery	05-20	0.75	4	21	Ground Spray (2)	58.13
NJ Nursery	05-08	0.75	4	21	Ground Spray (2)	58.47
PA turf	05-07	0.75	4	21	Ground Spray (2)	24.43
PA turf	06-05	0.26	12	14.	Ground Spray (2)	18.19
PA turf	05-05	0.26	12	14	Ground Spray (2)	15.70

For granular formulations: spray drift was assumed to be 0% and application efficiency was assumed to be 100%; for ground spray drift was assumed to be 1% and application efficiency was assumed to be 99% (USEPA, 2009) ² CAM is Chemical application method and is an input parameter in the PRZM model.

3. Aquatic Exposure Monitoring and Field Data

For flurprimidol, no monitoring data were available for use in this aquatic exposure assessment. Therefore, potential exposure of non-target organisms to flurprimidol in surface water was evaluated through modeling.

4. Measures of Terrestrial Exposure

Terrestrial wildlife exposure estimates are typically calculated for birds and mammals, emphasizing a dietary exposure route for uptake of pesticide active ingredients. These exposures are considered as surrogates for terrestrial-phase amphibians as well as reptiles. For exposure to terrestrial wildlife, such as birds and small mammals, pesticide residues on food items or ground surfaces are estimated, based on the assumption that animals are exposed to a single pesticide residue in a given exposure scenario.

For flurprimidol spray applications applied to foliar surfaces, estimation of pesticide concentrations in wildlife food items (mg ai/kg diet) focuses on quantifying possible dietary ingestion of residues on vegetative matter and insects. For granular and liquid formulations applied to ground surfaces, estimation of pesticide concentrations on the ground (mg ai/sq ft) focuses on quantifying possible dietary ingestion of residues on the ground.

Birds and Mammals a.

No field residue data or field study information is available for flurprimidol; therefore, the residue estimates were based on a nomogram that relates food item residues to pesticide

application rate. The residue EECs were generated from a spreadsheet-based model (T-REX version 1.4.1; USEPA, 2001) that calculates the decay of a chemical applied to foliar surfaces for single or multiple applications, and is based on the methods of Hoerger and Kenaga (1972) as modified by Fletcher *et al.* (1994). EECs were calculated using a foliar dissipation default half-life of 35 days (Willis and McDowell, 1987). Uncertainties in the terrestrial EECs are primarily associated with a lack of data on interception and subsequent dissipation from foliar surfaces. T-REX does not differentiate between backpack sprayer, spot treatment, and ground boom applications, the method of application is not considered; thus, these methods are not evaluated.

Acute exposures from granular and liquid formulations applied to ground surfaces are estimated using the LD₅₀/sq ft analysis in T-REX. Estimation of pesticide concentrations (mg ai/ft²) for granules and liquid focuses on quantifying possible dietary ingestion of residues on ground surfaces. The equation used to calculate mg a.i./ft² EECs is presented below for broadcast granular and liquid applications to ground surfaces. Acute exposure from "banded" applications is uncertain since T-REX does not have the capability to assess risk to terrestrial animals from "banded" applications that are applied around the perimeter/edge of lawns, sidewalks, parking lots, and building structures; thus, EECs for "banded" applications will be calculated using the same equation below assuming that a "banded" application is equivalent to a broadcast application. However, this assumption leads to an overestimation of the EECs since the entire acre will not be completely treated when "banded" applications are applied solely on the edge of an area.

Broadcast granular/liquid applications to ground surfaces: mg a.i./ft² = (application rate x % a.i. x 453,590 mg/lb)/43,560 ft²/acre

To provide potential maximum exposures to non-target birds and mammals based on proposed label uses of flurprimidol on turfgrasses and ornamentals, residue EECs were calculated using six pesticide exposure scenarios: four broadcast spray application at 0.75 lb a.i./A with 2-week reapplication intervals, twelve broadcast applications at 0.26 lb a.i./A with 2-week intervals, five broadcast spray application at 0.69 lb a.i./A with 8-week intervals, four broadcast application of granules at 0.75 lb a.i./A with 3-week intervals, one broadcast application of granules at 3.0 lb a.i./A, and two broadcast application of granules at 1.5 lb a.i./A with 8-week intervals.

The active ingredient EECs on terrestrial food items and granules may be compared directly with dietary toxicity data or converted to an oral dose. The residue concentration is converted to daily oral dose based on the fraction of body weight consumed daily as estimated through allometric relationships. The risk assessment for flurprimidol uses upper bound predicted residues as the measure of exposure; however, mean EECs are also presented for characterization purposes.

Tables III-6, III-7, and III-8 provide dietary- and dose-based EECs for broadcast spray applications to foliar surfaces, **Table III-9** provides intermediate EECs for "banded" spray applications to ground surfaces, **Table III-10** provides intermediate EECs for broadcast granular applications to ground surfaces, and **Table III-11** provides intermediate EECs for "banded" granular applications to ground surfaces.

Table III-6. Terrestrial Dietary-Based EECs (Bird and Mammal) Following Flurprimidol Broadcast Spray Application to Foliar Surfaces.								
Uses	# of App. x App. Rate	Food Items	Upper Bound EEC ¹ (mg ai/kg)	Mean EEC ² (mg ai/kg)				
Turf grass /	4 applications at 0.75 lb ai/A with 2 week intervals Short Grass Tall Grass Sm. Insects, Broadleaf Plants Lg. Insects, Fruits, Pods		498.15 228.32 280.21 31.13	176.43 74.72 93.4 14.53				
Ornamentals	12 applications at 0.26 lb ai/A with 2 week intervals	Short Grass Tall Grass Sm. Insects, Broadleaf Plants Lg. Insects, Fruits, Pods	248.45 113.84 139.75 15.53	87.99 37.27 46.58 7.25				

Used to determine the potential risk to non-target wildlife and the need to consider regulatory action.

2 Used to further evaluate the likelihood of adverse ecological effects to non-target species.

	# of Ann v Ann		Avian	Classes and Body V	Veights
Uses	# of App. x App. Rate	Food items	small	mid	large
<u></u>	Kate		20 g	100 g	1000 g
		Upper Bound EEC	(mg ai/kg) ¹		
		Short Grass	567.34	323.52	144.84
	4 applications at	Tall Grass	260,03	148.28	66.39
	0.75 lb ai/A with 2 week intervals	Sm. Insects, Broadleaf Plants	319.13	181.98	81.48
Turf grass / Ornamentals		Lg. Insects, Fruits, Pods	35.46	20.22	9.05
		Short Grass	282.96	161.36	72.24
	12 applications at 0.26 lb ai/A with 2 week intervals	Tall Grass	129.69	73.95	33,11
		Sm. Insects, Broadleaf Plants	159.16	90.76	40.64
		Lg. Insects, Fruits, Pods	17.68	10.08	4.52
		Mean EEC (m	g ai/kg) ²		
		Short Grass	200.93	114.58	51.30
	4 applications at	Tall Grass	85.10	48.53	21,73
	0.75 lb ai/A with 2 week intervals	Sm. Insects, Broadleaf Plants	106.38	60.66	27.16
Turf grass /		Lg. Insects, Fruits, Pods	16.55	9.44	4.22
Ornamentals		Short Grass	100.21	57.15	25.59
	12 applications at	Tall Grass	42.44	24.20	10.84
	0.26 lb ai/A with 2 week intervals	Sm. Insects, Broadleaf Plants	53.05	30.25	13.55
	WEEK HILOTVIES	Lg. Insects, Fruits, Pods	8.25	4,71	2.11

Used to determine the potential risk to non-target wildlife and the need to consider regulatory action.

² Used to further evaluate the likelihood of adverse ecological effects to non-target species.

	Table III-8. Terres	trial Dose-Based EECs (M	ammals) Follow					
]·	Mammal Classes and Body Weights					
Uses	# of App. x App.	Food items		bivores / Insective		Granivores		<u>-</u>
	Rate	<u> </u>	small	mid	large	small	mid	large
	<u> </u>	<u></u>	15 g	35 g	1000 g	15 g	35 g	1000 g
				EEC (mg ai/kg) ¹		Tentouries and an additional tentouries	AND THE STREET PROPERTY OF THE STREET,	DO MONTH OF THE PROPERTY OF THE PARTY OF THE
		Short Grass	474.94	328.25	76.11			
	4 applications at	Tall Grass	217.68	150.45	34.88			
	0.75 lb ai/A with	Sm. Insects, Broadleaf						
	2 week intervals	Plants	267.16	184.64	42.81			
Turf grass /	l	Lg. Insects, Fruits, Pods	<u> 29</u> .68 <u> </u>	20.52	4.76	6.60	4.56	1.06
Ornamentals	12 applications at 0.26 lb ai/A with	Short Grass	236.88	163.71	37.96			
		Tall Grass	108.57	75.04	17.40			
		Sm. Insects, Broadleaf						
	2 week intervals	Plants	133.24	92.09	21.35			
	<u></u>	Lg. Insects, Fruits, Pods	14.80	10.23	2.37	3.29	2.27	0.53
	<u>-</u>		Mean EE	C (mg ai/kg)²				
		Short Grass	168.21	116.26	26.95			
	4 applications at	Tall Grass	71.24	49.24	11.42			
•	0.75 lb ai/A with	Sm. Insects, Broadleaf						
	2 week intervals	Plants	89.05	61.55	14.27			
Turf grass /		Lg. Insects, Fruits, Pods	13.85	9.57	2.22	3.08	2.13	0.49
Ornamentals		Short Grass	83.89	57.98	13.44			
	12 applications at	Tall Grass	35.53	24.56	5.69			
	0.26 lb ai/A with	Sm. Insects, Broadleaf						
	2 week intervals	Plants	44.41	30.70	7.12			
		Lg. Insects, Fruits, Pods	6.91	4.77	1,11	1.54	1.06	0.25

Used to determine the potential risk to non-target wildlife and the need to consider regulatory action.

2 Used to further evaluate the likelihood of adverse ecological effects to non-target species.

Table III-9. Terrestrial EECs (mg ai/ft²) Following Flurprimidol "Banded" Spray Applications to Ground Surfaces ^{1,2}						
Uses	# of App. x App. Rate	Intermediate Calculations	EEC			
Turf grass and Ornamentals	One (broadcast) spray application at 0.69 lb ai/A	# rows acre-1:	N/A			
		row length (ft):	N/A			
		lb ai/1000 ft row:	N/A			
		bandwidth (ft):	N/A			
		mg ai/ft² (EEC):	7.18			

¹ T-REX does not have the capability to calculate EECs based on "banded" applications in a residential setting; therefore, EECs are based on broadcast applications.

² Accounts only for a single application, not multiple applications

Table III-10. Terrestrial EECs (mg ai/ft²) Following Flurprimidol Broadcast Granular Applications to Ground Surfaces						
Uses	# of App. x App. Rate	Intermediate Calculations	EEC			
	200	# rows acre-1:	N/A			
	One breedenst emplication	row length (ft):	N/A			
	One broadcast application of granules at 0.75 lb ai/A	lb ai/1000 ft row:	N/A			
	or granules at 0.75 ib al/A	bandwidth (ft):	N/A			
Turf grass and	_	mg ai/ft² (EEC):	_ 7.81			
Ornamentals	One breadest an lighting	# rows acre-1:	N/A			
		row length (ft):	N/A			
	One broadcast application of granules at 3.0 lb ai/A	Ib ai/1000 ft row:	N/A			
	or grantices at 5.0 to avA	bandwidth (ft):	N/A			
		mg ai/ft² (EEC):	31.24			

Uses	# of App. x App. Rate	Intermediate Calculations	EEC
		# rows acre-1:	N/A
T - C - 1	One (broadcast)	row length (ft):	N/A
Turf grass and Ornamentals	application of granules at	Ib ai/1000 ft row:	N/A
Ornamentals	1.5 lb ai/A	bandwidth (ft):	N/A.
	1	mg ai/ft² (EEC):	15.62

¹ T-REX does not have the capability to calculate EECs based on "banded" applications in a residential setting; therefore, EECs are based on broadcast applications.

Chronic exposures from flurprimidol granules are estimated using the earthworm fugacity model. Estimation of pesticide concentrations in earthworms (mg/kg-earthworm) focuses on quantifying possible dietary ingestion of residues bioaccumulated in earthworms (Table III-12). Then, the bioconcentrated earthworms (mg/kg-earthworm) are compared to terrestrial animal NOAEC values (mg a.i./kg) to estimate the potential for chronic risk to birds or mammals associated with direct ingestion of earthworms. Equation used to calculate the concentration of flurprimidiol in the tissues of earthworm is presented below. More information on the equation can be found in Appendix D. Table III-12 presents the highest exposure scenario of the proposed use scenarios.

$$C_{earthworm} = [(C_{soil})(Z_{earthworm}/Z_{soil})] + [(C_{soil\ water})(Z_{earthworm}/Z_{water})]$$

² Accounts only for a single application, not multiple applications

Application Rate	Body Weight (g)	Daily fresh food intake (kg/day) ^a	Earthworm EEC (mg/kg-earthworm		
	Avian, Dose-based				
	20	0.02	0.04		
	100	0.07	0.02		
	1000	0.3	0.01		
		Avian, Dietary-b	ased		
3.0 lb a.i./A	All	(0.035		
	Mammal, Dose-based				
	15	0.01	0.03		
	35	0.02	0.02		
	1000	0.2	0,005		

^a Food Intake = $(0.648 \text{ x BW}^{0.651} / \text{ I-W}) / (\text{BW assessed})$; BW = body mass of bird or mammals in grams, W = % water in food.

b. Soil-Dwelling Invertebrates

Soil EECs for soil-dwelling invertebrates are estimated by converting the application rate of lb/A to mg/kg soil, using a soil density of 1.3 g/cm³. The highest exposure scenario of all proposed use scenarios is presented in **Table III-13**.

Table III-13. Soil EECs (mg ai/kg-soil) Following Flurprimidol Granular Applications					
Uses	Application Rate	Soil Density	EECs (mg/kg-soil)		
Turf grass and Ornamentals	3.0 lb ai/A	1.3 g/cm ³	8.57		

c. Terrestrial Plants

TerrPlant (USEPA, 2006), a Tier I model, predicts EECs for terrestrial plants located in dry and semi-aquatic areas adjacent to the treated field. The active ingredient EECs are based on the application rate, soil incorporation, runoff fraction, drift fraction and solubility of the pesticide in water and drift characteristics, which depend on ground and aerial applications. The amount of flurprimidol that runs off is a proportion of the application rate and is assumed to be 5% based on flurprimidol solubility of 130 mg ai/L in water. Drift from ground and granular applications are assumed to be 1% and 0%, respectively, of the application rate. TerrPlant does not differentiate between banded or broadcast applications; thus, the only method of application considered in this model is ground unincorporated application.

^b Dose-based Earthworm EECs = Food Intake x Dietary-based Earthworm EEC / BW

For a standard scenario on an agricultural field when applications are occurring on land, EFED's runoff scenario for terrestrial plants inhabiting dry areas adjacent to a field is characterized as "sheet runoff" (one treated acre to an adjacent acre: a 1:1 ratio) and inhabiting semi-aquatic or wetland areas adjacent to a field is characterized as "channelized runoff" (10 treated acre to a distant low-lying acre: a 10:1 ratio). Details of the TerrPlant model and EECs are presented in **Table III-14** and in **Appendix E**.

			Concentration (lbs ai/A)				
Application Rate	Application Method ⁴	Total Loading to Areas Adjacent to Treated Areas ¹	Total Loading to Semi- Aquatic Areas Adjacent to Treated Areas ²	Drift to Adjacent Areas			
0.75 lb ai/A	Spray	0.045	0.3825	0.0075			
	Granules	0.0375	0.375	None			
0,26 lb ai/A	Spray	0,0156	0.1326	0.0026			
1.5 lb ai/A	Granules	0.075	0.75	None			
3.0 lb ai/A	Granules	0.15	1.5	None			

EEC = Sheet Runoff + Drift (1% for ground; 0% for granules)

IV. Ecological Effects Characterization

With the submission of new ecological toxicity data on avian reproduction, seedling emergence, vegetative vigor, aquatic vascular plant, freshwater fish early life-stage, and freshwater invertebrate life cycle, the ecological effects profile for flurprimidol has been updated. A more robust discussion of acute toxicity to aquatic and terrestrial animals can be found in the previous risk assessment (D292874, D310484, D315363, and D315836). The key toxicity endpoints used in this assessment are summarized in **Tables IV-1** and **IV-2** below.

A. Aquatic Effects Characterization

Table IV-1 presents the most sensitive toxicity endpoints used to estimate risk to aquatic receptors from exposure to flurprimidol.

² EEC = Channelized Runoff + Drift (1% for ground; 0% for granules)

³ EEC for ground (appl. rate x 1% drift); for granules (appl. rate x 0% drift)

⁴ EEC for Unincorporated Ground Spray Application

Table IV-1. Flurprimidol Toxicity Profile for Aquatic Animals and Plants							
Taxon	Exposure Duration	Most Sensitive Species Tested	Toxicity Value	Toxicity Category	MRID / Classification		
	Acute	Bluegill Sunfish Lepomis macrochirus	LC ₅₀ = 17.2 mg ai/L	Slightly toxic	00117925 (acceptable)		
Freshwater Fish	Chronic	Fathead minnow Pimephales promelas	NOAEC = 0.939 mg ai/L LOAEC = 1.75 mg ai/L Reductions in fry survival, length, and weight.	Not applicable	47459602 (acceptable)		
Estuarine/ Marine Fish	Acute	Not required at this time					
Freshwater Invertebrates	Acute	Water Flea Daphnia magna	EC ₅₀ = 11.8 mg ai/L	Slightly toxic	00117927 (acceptable)		
	Chronic	Waler Flea Daphnia magna	NOAEC = 2.95 mg ai/L LOAEC = 5.70 mg ai/L Reductions of young per adult and adult length, as well as significant difference in day of first brood when compared to control	Not applicable	47459601 (acceptable)		
Estuarine/ Marine Invertebrates	Acute		Not required at this t	time			
Vascular plant	Acute	Duckweed , Lemna gibba	EC ₅₀ = 8.5 µg ai/L NOAEC = 0.89 µg ai/L Reduction in # of fronds	Not applicable	47472101 (supplemental)		
Non- vascular plant	Acute	Green algae Selenastrum capricarnutum	$EC_{50} = 0.84$ mg ai/L NOAEC = 0.28 mg ai/L Reduced biomass	Not applicable	40401011 (acceptable)		

B. Terrestrial Effects Characterization

Table IV-2 presents the most sensitive toxicity endpoints used to estimate risk to terrestrial receptors from terrestrial exposures of flurprimidol.

Taxon	Exposure Duration	Most Sensitive Species Tested	Toxicity Value	Toxicity Category	MRID Reference
	Acute	Rat Rattus norvegicus	LD ₅₀ = 709 mg ai/kg bw	Slightly toxic	00117932 (acceptable)
Mammals	Chronic	Rat Ratius norvegicus	NOAEL = 100 mg ai/kg diet (7.3 mg ai/kg-bw/day) LOAEL = 1000 mg ai/kg diet Decreased mating, fertility, and fetal survival (stillbirths) in both generations and increased incidence of persistent vaginal estrous and no corpora lutea.	Not applicable	00162770

Table IV-2. Flurprimidol Toxicity Profile for Terrestrial Animals and Plants							
Taxon	Exposure Duration	Most Sensitive Species Tested	Toxicity Value	Toxicity Category	MRID Reference		
	Acute Oral	Bobwhite quail Colinus virginianus	LD ₅₀ >2000 mg ai/kg b w	. Practically nontoxic	00117928 (acceptable)		
Non-	Acute Dietary	Bobwhite quail Colinus virginianus	LC ₅₀ >4310 mg ai/kg diet	Practically nontoxic	00117929 (supplemental)		
passerine Birds	Chronic	Mallard duck Anas platyrhynchos	NOAEC = 309 mg ai/kg diet LOAEC = 642 mg ai/kg diet Reductions in egg production, embryo survival, and hatchability	Not applicable	47459603 (acceptable)		
Passerine Bird	Acute	No data	No data	Not determined	No data		
Beneficial Insects	Acute	Honey Bee Apis mellifera	LD ₅₀ >100 μg a.i./bee	Relatively nontoxic	40401004 (acceptable)		
Terrestrial Invertebrates	Acute	Earthworm Lumbricus terrestris	LD ₅₀ >100 mg ai/kg	Practically nontoxic	00117931 (supplemental)		
Terrestrial Plants -	Plants - Seedling Emergence Survival		Ryegrass (monocot) Lolium perenne	EC ₂₅ = 0.14 lb ai/A NOAEC = 0.038 lb ai/A Reduced shoot length	NVA	47459606	
Seedling Emergence		Cucumber (dicot) Cucumis sativa	EC ₂₅ = 0.012 lb ai/A NOAEC = 0.0044 lb ai/A Reduced shoot length	N/A	(acceptable)		
Terrestrial Plants -	estrial Lotium perenne etative Lettura (dicat)	Ryegrass (monocot) Lolium perenne	EC ₂₅ = 0.42 lb ai/A NOAEC = 0.11 lb ai/A Reduced shoot length		47459607		
Vegetative Vigor		igor Lettuce (dic		EC ₂₅ = 0.011 lb ai/A NOAEC = 0.046 lb ai/A Reduced shoot length	N/A	(acceptable)	

¹ http://bees.ucr.edu/tox.html

V. RISK CHARACTERIZATION

To evaluate the potential risk to non-target organisms from the proposed use of flurprimidol, risk quotients (RQs) or LD_{50}/ft^2 are calculated from the ratio of estimated environmental concentrations (EECs) to ecotoxicity values. RQs and LD_{50}/ft^2 are then compared to the Agency's levels of concern (LOCs) used by OPP to indicate potential risk to non-target organisms. LOCs are the Agency's interpretive policy and are used to analyze potential risk to non-target or *listed* organisms and the need to consider regulatory action. These criteria are used to indicate when a pesticide's use as directed on the label has the potential to cause adverse effects on non-target or *listed* organisms. In the following risk characterization, when appropriate, the RQs for applications to foliar surfaces are calculated first then the LD_{50}/ft^2s for applications to ground surfaces are calculated afterwards.

A. Risks to Aquatic Organisms and Plants

For this baseline risk assessment with aquatic organisms and plants, acute and chronic RQs (Table V-1) are derived based on ecological toxicity data for the active ingredient and then

compared to the EECs generated from GENEEC2. The peak EEC is used to calculate the acute RQs and the 21-day and 60-day average concentrations (EECs) are used to calculate chronic RQs for invertebrates and fish, respectively. Details of the acute and chronic GENEEC2 EEC calculations for aquatic animals and plants are provided in **Section III.2**. The potential risks to aquatic animals and plants are described further in the Risk Description section.

1. Freshwater Fish / Invertebrates

Minimal acute and chronic risks are expected for freshwater fish and invertebrates because no acute or chronic LOCs are exceeded (**Table V-2**) when flurprimidol is applied at the highest exposure among of a suite of use scenarios. Therefore, EFED expects minimal risk from maximum applications at other use scenarios, because aquatic EECs resulting from maximum applications to those scenarios are lower than the highest exposure scenario of five applications at 0.69 lb ai/A with a 56-day reapplication interval.

Table V-2. Risi	Quotients for Freshwater Animals fo	r Proposed Flu	rprimidol Use a	s Plant Growth F	Regulator 1, 2	
Use	# of App. x App. Rate x Interval	Freshwater 1 (LC ₅₀ = 17.2 NOAEC = 0.		Freshwater Invertebrate ⁴ (EC ₅₀ = 11.8 mg a.i./L; NOAEC = 2.95 mg a.i./L)		
		Acute	Chronic	Acute	Chronic	
Turf grass / Ornamentals	5 apps x 0.69 lb ai/A x 8 wks intervals (spray)	<0.01	0.13	<0.01	0.04	

LOC exceedances are bolded (Endangered Species LOC = 0.05; Acute Restricted LOC = 0.1; Acute Risk = 0.5 and Chronic LOC = 1).

2. Estuarine/Marine Fish and Invertebrates

RQs are not calculated for estuarine/marine fish and invertebrates because there are no toxicity data available. However, data on estuarine/marine organisms are not needed at this time as it is unlikely that they would be sufficiently more sensitive than their freshwater counterparts such that Agency levels of concern would be exceeded.

3. Aquatic Plants I. Tier I EECs

Based on all exposure scenarios and peak GENEEC EECs, risks are expected for aquatic vascular plants because the *non-listed* and *listed plants* LOCs are exceeded (**Table V-3**) for vascular plants when flurprimidol is applied at the maximum application rates listed on the product label.

Of all exposure scenarios and GENEEC EECs, minimal risk is assumed for aquatic non-vascular plants from maximum application rates listed on the product label.

² Tier I EECs from Table III-3.

³ Freshwater fish acute RQ = Peak EEC ÷ LC₅₀; chronic RQ = 60-day EEC ÷ NOAEC

⁴ Freshwater invertebrate acute RQ = Peak EEC ÷ EC₅₀; chronic RQ = 21-day EEC ÷ NOAEC

Use	# of App. x App. Rate x Interval	Vascular Aqu $(EC_{50} = 0.085$ NOAEC = 0.0		Non-Vascular Aquatic Plant (EC ₅₀ = 0.84 mg ai/L; NOAEC = 0.28 mg ai/L)		
	-	Non-Listed	Listed	Non-Listed	Listed	
<u> </u>	5 apps x 0.69 lb ai/A x 8 wks intervals (spray)	1.6	16	0.16	0.49	
,	12 apps. x 0.26 lb ai/A x 2 wks intervals (spray)	1.5	14	0.15	0.46	
	4 apps x 0.75 lb ai/A x 2 wks intervals (spray)	1.5	14	0.15	0.46	
Turf grass / Ornamentals	2 apps x 1.5 lb ai/A x 8 wks intervals (spray)	1.5	14	0.15	0.46	
	1 app x 3.0 lb ai/A (granule)	1.4	13	0.14	0.42	
	2 apps x 1.5 lb ai/A x 8 wks intervals (granule)	1.4	13	0.14	0.42	
	4 apps x 0.75 lb ai/A x 3 wks intervals (granule)	1.4	13	0.14	0.42	

¹ LOC exceedances are bolded (Non-listed Plant LOC >1; Listed Plant LOC > 1).

II. Tier II EECs

Since the Tier I EECs for aquatic vascular plants yield risk quotients higher than Agency's LOC, the assessment must be refined to be more reflective of actual use site conditions. Based on selected exposure scenarios and peak PRZM/EXAMS EECs, risks are expected because the *listed plant* LOC is still exceeded (Table V-4) for vascular plants when flurprimidol is applied at the maximum application rates listed on the product labels.

Use	Scenarios	App. Rate / No. of Apps. / Intervals	Application Method	Peak EECs (µg a.i./L)	Vascular Aquatic Plant ³ $(EC_{50} = 0.085 \text{ mg ai/L};$ $NOAEC = 0.0089 \text{ mg ai/L})$		
	ļ	/ Intervals	!		Non-Listed	Listed	
Turf grass /	FL Nursery	3/1/0	granular	74,94	0.88	8.42	
Ornamentals	MI Nursery	3/1/0	granular	29.19	0.34	3.28	
	MI Nursery	1.5 / 2 / 60	granular	41.40	0.49	4.65	
	NJ Nursery	0.75/4/21	ground spray	40.83	0.48	4.59	
	NJ Nursery	0.75 / 4 / 21	ground spray	58.13	0.68	6.53	
	NJ Nursery	0.75/4/21	ground spray	58.47	0.69	6.57	
	PA turf	0.75/4/21	ground spray	24.43	0.29	2.74	
	PA turf	0.26 / 12 / 14	ground spray	18.19	0.21	2.04	

² Tier I EECs from Table III-3.

³ Non-listed vascular RQ = Peak EEC ÷ EC50; listed vascular RQ = Peak EEC ÷ NOAEC

⁴ Non-listed non-vascular RQ = Peak EEC ÷ EC50; listed non-vascular RQ = Peak EEC ÷ NOAEC

_	PA turf	0.26/12/14	ground spray	15.70	0.18	1.76

¹ LOC exceedances are bolded (Non-listed Plant LOC >1; Listed Plant LOC > 1).

B. Risks to Terrestrial Animals

For this baseline assessment with terrestrial animals, acute and chronic risk indices for applications to foliar surfaces are derived based on ecological toxicity data for the active ingredient (ai), and then compared to the EECs generated from the T-REX model. Acute and chronic RQs are calculated by comparing the acute and chronic toxicity values of the AI to T-REX EECs generated based on spray applications to foliar surfaces, while acute LD₅₀/ft²s are calculated by comparing the acute toxicity values of the AI to T-REX EECs generated based on application to ground surfaces. With no methodology available for assessing chronic risk to birds and mammals from granular consumption, chronic LD₅₀/ft²s are calculated by comparing the chronic toxicity values of the AI to the highest EEC of flurprimidol in earthworm tissue. Terrestrial EECs (dose-based, dietary-based, or mg ai/ft²) were derived for the use of flurprimidol based on the six exposure scenarios developed for this baseline assessment. The potential risks to terrestrial animals are described further in the Risk Description section.

1. Birds and Mammals

In this subsection, two types of risk quotients for broadcast spray applications to foliar surfaces (e.g., short grass, broadleaves, and seeds) are calculated to evaluate the risks to birds and mammals based on the estimated dietary residue concentrations determined from the Kenaga nomogram: (1) dietary-based RQs; and (2) dose-based RQs. RQ calculations (Table V-5) are based on an adjusted LD_{50} and exposure value (mg ai/kg-bw or mg ai/kg-diet). These RQs are not equivalent. Dietary risk quotients are calculated by directly comparing the concentration of a pesticide administered (or estimated to be administered) to experimental animals in the diet in a toxicity study to the concentration estimated to be on selected food items. These risk quotients do not account for the fact that smaller-sized animals need to consume more food relative to their body weight than larger animals or those differential amounts of food are consumed depending on the water content and nutritive value of the food. The dose-based risk quotients do account for these factors. The dose-based RQs incorporate the ingestion rate-adjusted exposure from the various food items to the different weight classes of birds and mammals and the weight class-scaled toxicity endpoints.

However, for spray and granular applications to ground surfaces, T-REX only allows LD_{50}/ft^2s "dose-based RQs" calculations to evaluate only the acute risk to birds and mammals; thus, the "dietary-based RQs" and chronic risk were not calculated and excluded from the assessment for spray application and granular products. The LD_{50}/ft^2 method modeled by T-REX is used to estimate the magnitude by which the LD_{50} is exceeded for a bird or mammal occupying one square foot of the treated area subjected to all routes of exposure. The LD_{50}/ft^2 method does not capture feeding behaviors of the animals that would increase exposure, such as incidental granule ingestion with soil, as birds may consume soil at a rate of 2 to 14% of daily diet (USEPA, 1993),

² Tier II EECs from Table III-5.

³ Non-listed vascular RQ = Peak EEC ÷ EC50; listed vascular RQ = Peak EEC ÷ NOAEC

⁴ Non-listed non-vascular RQ = Pcak EEC ÷ EC50; listed non-vascular RQ = Peak EEC ÷ NOAEC

active consumption of granules due to their resemblance to grain seeds, or efforts to collect grit to assist in food breakdown. Since the granules are not incorporated in the ground, EFED assume that 100% of the granules applied will remain uncovered on the surface, available for consumption by terrestrial animals. LD₅₀/ft² calculations (**Table V-6**) are based on an adjusted LD₅₀ and exposure value (mg ai/ft²). Terrestrial animals may be exposed to granular pesticides ingesting granules when foraging for food or grit. Other routes also may expose them, such as by walking on exposed granules or direct ingestion of earthworm. The numbers of lethal doses (LD₅₀s) that are available within one square foot immediately after application (LD₅₀s/ft²) is used as the risk index for spray application and granular products applied to ground surfaces. LD₅₀s/ft²s are calculated by comparing the mg a.i./ft² to three separate weight class of birds: 1000 g (e.g., waterfowl), 100 g (e.g., upland gamebird), and 20 g (e.g., songbird) and three separate weight class of mammals: 1000 g, 35 g, and 15 g.

	5. Formulas u ons to foliar su		dose- and dietary-based risk quotients for spray
Duration	Dose or Dietary RQ	Surrogate Organism	Equation
Acute	Dose-based Birds and mammals		Acute Daily Exposure (mg/kg-bw) / adjusted LD ₅₀ (mg/kg-bw)
<u></u>	Dietary-based	Birds only	Kenaga EEC (mg/kg-food item) / LC50 (mg/kg-diet)
	Dose-based	Manumals only	EEC (mg/kg-bw) / Adjusted NOAEL (mg/kg-bw)
Chronic Dietary-based		Birds and mammals	EEC (mg/kg-food item) / NOAEC (mg/kg-diet)

Table V-6. Formulá used to calculate dose-based LD ₅₀ /ft ² s for applications to ground surfaces.									
Duration	Dose or Dietary RQ	Surrogate Organism	Equation						
Acute only	Dose-based only	Birds and mammals	EEC (mg/ft ²) / adjusted LD ₅₀ (mg/kg-bw)						

Before the risk indices are calculated for birds and mammals, the EECs and toxicity values are adjusted based on food intake and body weight differences so that they are comparable for a given weight class of animal. The size classes assessed for birds are small (20-gram), medium (100-gram), and large (1000-gram), while the size classes assessed for mammals are small (15-gram), medium (35-gram), and large (1000-gram). However, extrapolation from one size class to another needs to consider differences in the scaling of toxicity for differences in body weight. For birds, only acute values (LD₅₀s) are adjusted because dose-based risk quotients are not calculated for the chronic risk estimation, while only chronic values are adjusted for mammals because dietary-based risk quotients are not calculated for the acute risk estimation.

For birds, the bobwhite quail LD_{50} of >2000 mg/kg-bw is adjusted for birds of various sizes based on the following formula, recommended by Mineau *et al.* 1996:

Adj.
$$LD_{50} \approx LD_{50} (AW/TW)^{(a-1)}$$

where adj. LD₅₀ is the median 50% lethal dose for the species being assessed, LD₅₀ is the median lethal dose in the test organism, AW is the body weight of the assessed organism, TW is the body weight for the test organism, and a is the slope of the regression line for estimating the assessed species LD₅₀ from the test species LD₅₀ (EFED default value of 1.15). Adjusted LD₅₀s are calculated for small (20-gram), medium (100-gram), and large (1000-gram) birds. The test organism is a bobwhite quail with an average body weight of 0.178 kg (178 grams). For mammals using similar methodology to that employed for birds, the rat LD₅₀ and NOAEL of 709 mg/kg-bw and 7.3 mg/kg/day/bw, respectively, are adjusted for mammals of various sizes based on the following formula:

Adj.
$$LD_{50}$$
 or $NOAEL = LD_{50}$ or $NOAEL (TW/AW)^{0.25}$

LD₅₀, TW, and AW were previously defined. Adjusted LD₅₀s and NOAELs are calculated for small (15-gram), medium (35-gram), and large (1000-gram) mammals. The test organism is a rat with a reference body weight of 350 grams.

The resulting adjusted LD₅₀s and NOAEL are in Table V-7 below.

e V-7. Adjusted LD ₅₀ s for Birds and Mammals Based on an LD ₅₀ of >2000 mg/kg-bw and 709 kg-bw, respectively, and Adjusted NOAEL for Mammals Based on an NOAEL of 7.3 mg/kg/day/ t										
Species	Class	Body Weight	Adjusted LD ₅₀	Adjusted NOAEC						
	Small	20	>1441	Not adjusted						
Avian	Mid	100	>1534	Not adjusted						
	Large	1000	>2591	Not adjusted						
	Small	15	1558	16						
Mammal	Mid	35	1261	13						
	Large	100	545	5.6						

a. Potential Risks to Birds via Broadcast Spray Applications to Foliar Surfaces

Acute ROs – Broadcast Spray Applications to Foliar Surfaces

Available acute toxicity data for birds suggest that flurprimidol is practically non-toxic to birds on acute oral and dietary bases. Study results indicate that the acute toxicity thresholds are greater than the highest concentrations tested (acute $LD_{50} > 2000$ mg ai/kg-bw and subacute dietary $LC_{50} > 4310$ mg ai/kg-diet). Since definitive acute toxicity thresholds were not established, acute avian RQs (dose- and dietary-based) were not estimated, and the potential risk and uncertainties to birds (surrogate for reptiles and terrestrial-phase amphibians) from spray applications to foliar surfaces are described qualitatively in the Risk Description section.

Chronic RQs - Broadcast Spray Applications to Foliar Surfaces

Available reproductive toxicity data for birds indicated that flurprimidol caused significant reductions of egg production, embryo survival, and hatchability as low as 642 mg ai/kg-diet, establishing the no-effect concentration at 309 mg ai/kg-diet. Assuming the maximum exposure scenario for broadcast spray applications to foliar surfaces at 0.75 lb ai/A applied four times with

2-week reapplication intervals, as well as the maximum predicted EECs; with an NOAEC of 309 mg ai/kg-diet, the chronic RQ is 1.6, which does exceed the LOC of 1.0 for birds consuming short grass only (**Table V-8**). However, assuming the lower scenario for broadcast spray applications to foliar surfaces at 0.26 lb ai/A applied twelve times with a 2-week reapplication interval, the highest RQ is 0.8 which does not exceed the chronic LOC for any of the assessed feed items.

The exceedance indicates avian species that consume short grass may be at risk for adverse effects to growth and reproduction from chronic exposure to flurprimidol as a result of broadcast spray application to foliar surfaces and will be discussed in the Risk Description section.

Table V-8 presents the chronic RQ calculations for birds exposed to flurprimidol via broadcast spray applications to foliar surfaces.

Table V-8. Spray Appli				nic Avia	n Dieta	ary-Based l	Risk Quot	ients for B	oadcast			
		EECs and RQs										
Scenario	NOAEC (mg ai/kg- diet)	Short Grass		Tall Grass		Broadleaf Plants/ Small Insects		Fruits/Pods/ Seeds/ Large Insects				
	<u> </u>	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ			
4 apps at 0.75 lb ai/A with 2-week intervals	200	498	1.6*	228	0.7	280	0.9	31	0.1			
I2 apps at 0.26 lb ai/A with 2-week intervals	309	248	0.8	114	0.4	140	0.5	16	0.05			

^{*}Bolded entry indicates exceedance of the Chronic Risk and Endangered Species LOC (LOC >1)

b. Potential Risks to Birds via Banded Spray Applications to Ground Surfaces

Acute LD₅₀/ft² – Banded Spray Applications to Ground Surfaces

Available acute toxicity data for birds suggest that flurprimidol is practically non-toxic to birds on acute oral basis. Study results indicate that the acute toxicity thresholds are greater than the highest concentrations tested (acute $LD_{50}s > 2000$ mg ai/kg-bw). Since definitive acute toxicity thresholds were not established, acute avian LD_{50}/ft^2s were not estimated, and the potential risk and uncertainties to birds (surrogate for reptiles and terrestrial-phase amphibians) from banded spray applications to ground surfaces are described qualitatively in the Risk Description section.

c. Potential Risks to Mammals via Broadcast Spray Applications to Foliar Surfaces

Acute RQs – Broadcast Spray Applications to Foliar Surfaces

To evaluate acute risk to mammals, dose-based RQs are calculated using the rat LD₅₀ of 709 mg ai/kg-bw from the acute oral study with rats. Assuming the highest exposure scenario for

broadcast sprays to foliar surfaces (application rate at 0.75 lb ai/A applied three times with 2-week reapplication intervals), as well as the maximum predicted EECs for spray applications; the acute restricted use LOC of 0.2 and the endangered species LOC of 0.1 are exceeded for 15g and 35g mammals consuming short grass and the endangered species LOC is exceeded for 15g and 35g mammals consuming short grass, tall grass, and broadleaf plants and is also exceeded for 1000 g mammals consuming short grass. However, for the lower exposure scenario (12 applications of 0.26 lb ai/A with 2-week intervals), the endangered species LOC is narrowly exceeded for 15g and 35g mammals foraging on short grass. These exceedances indicate that herbivorous and insectivorous mammals of all weight classes may be at risk for adverse effects to survival from acute exposure to flurprimidol as a result of spray applications to foliar surfaces and will be discussed in the Risk Description section.

Dietary-based RQs are not estimated for mammals since acute dietary mammalian toxicity studies are not available.

Table V-9 presents the acute RQ calculations for mammals exposed to flurprimidol via broadcast spray applications to foliar surfaces.

	ļ	1	 	EECs and RQs									
Scenario	Size Class (grams)	Adjusted LD50	Short	Short Grass		Tall Grass		Broadleaf Plants/ Small Insects		Fruits/Pods/ Seeds/ Large Insects		Granivores	
	l	l	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ	
4 apps x 0.75	15	1558.26	474.94	0.30**	217.68	0.14*	267.16	0.17*	29.68	0.02	6.60	0.00	
Ib ai/A with 2-	35	1260.80	328.25	0.26**	150.45	0.12*	184.64	0.15*	20.52	0.02	4.56	0.00	
wks interval	1000	545.33	76.11	0.14*	34.88	0.06	42.81	0.08	4.76	0.01	1.06	0.00	
12 apps x 0.26	15	1558.26	236.88	0.15*	108.57	0.07	133.24	0.09	14.80	0.01	3.29	0.00	
Ib ai/A with 2-	35	1260.80	163.71	0.13*	75.04	0.06	92.09	0.07	10.23	0.01	2.27	0.00	
wks interval	1000	545.33	37.96	0.07	17.40	0.03	21.35	0.04	2.37	0.00	0.53	0.00	

Bold entries indicate LOC exceedance (***exceeds the acute risk, restricted use, and endangered species LOCs; **exceeds the restricted use and endangered species LOCs; and *exceeds the endangered species LOC)

Chronic RQs - Broadcast Spray Applications to Foliar Surfaces

To evaluate the chronic risk to mammals, dose-based and dietary-based RQs for broadcast spray applications to foliar surfaces are calculated using the rat NOAEL of 7.3 mg ai/kg bw/day and NOAEC of 100 mg ai/kg-diet, respectively, from the two-generation study. Assuming maximum and minimum residue levels of the spray application scenarios, the dose-based RQs greatly exceed the chronic LOC of 1 for mammals. The chronic LOC is exceeded for herbivorous and insectivorous mammals of all weight classes consuming all grass, broadleaf plants, and small insects and exceeded for 15g and 35g mammals consuming fruits and large insects with maximum residues. Granivorous mammals were not affected when foraging on the assessed feed items with maximum and minimum flurprimidol residues.

The dietary-based RQs also exceeded the chronic LOC for mammal consuming all the assessed feed items except fruits/large insects.

These exceedances indicate that mammals may be at risk for adverse effects to reproduction and growth from acute and chronic exposure to flurprimidol as a result of broadcast spray applications to foliar surfaces and will be discussed in the Risk Description section.

Tables V-10 and V-11 present the chronic RQ calculations for mammals exposed to flurprimidol via broadcast spray applications to foliar surfaces.

Applications to	Foliar Su	rfaces		EECs and RQs									
Scenario	Scenario Size Class (grams)		Short	Short Grass		Tall Grass		Broadleaf Plants/ Small Insects		Fruits/Pods/ Seeds/ Large Insects		Granivores	
			EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ	
4 apps x 0.75 lb	15	16.04	474.94	29.60	217.68	13.57	267.16	16,65	29.68	1.85	6.60	0.41	
ai/A with 2-wks	35	12.98	328.25	25.29	150.45	11.59	184.64	14.22	20.52	1.58	4.56	0.35	
interval	1000	5.61	76.11	13.55	34.88	6.21	42.81	7.62	4.76	0.85	1.06	0.19	
12 apps x 0.26	15	16.04	236.88	14.76	108.57	6.77	133.24	8.30	14.80	0.92	3.29	0.21	
lb ai/A with 2-	35	12.98	163.71	12,61	75.04	5.78	92.09	7.09	10.23	0.79	2.27	0.18	
wks interval	1000	5.61	37.96	6.76	17.40	3.10	21.35	3.80	2.37	0.42	0.53	0.09	

^{*}Bolded entries indicate exceedance of the Chronic Risk and Endangered Species LOC (LOC >1)

Table V-11. U Spray Applica			ronic M	ammalian	Dietary	Based Risk	Quotier	its for Bro	adcast		
		EECs and RQs									
Scenario .	NOAEC (mg ai/kg- diet)	Short Cross 19111-rass		ng ai/kg- Short Grass Tall Gra		Broadleaf Small In		Fruits/Pods/ Seeds/ Large Insects			
	}	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ		
4 apps x 0.75 lb ai/A with 2- wks interval	100	498.15	4.98	228.32	2.28	280.21	2.80	31.13	0.31		
12 apps x 0.26 lb ai/A with 2- wks interval	100	248.45	2.48	113.87	1.14	139.75	1.40	15.53	0.16		

¹ Size class not used for dietary risk quotients

c. Potential Risks to Mammals via Banded Spray Applications to Ground Surfaces

Acute LD50/ft2- Banded Spray Applications to Ground Surfaces

To evaluate acute risk to mammals, LD₅₀/ft²s are calculated using the rat LD₅₀ of 709 mg ai/kg-bw from the acute oral study with rats. Assuming the exposure scenario for "banded" sprays to ground surfaces at 0.69 lb ai/A (**Table V-12**) as well as the maximum predicted EECs; the acute

^{*}Bolded entries indicate exceedance of the Chronic Risk and Endangered Species LOC (LOC >1)

restricted use LOC of 0.2 and the endangered species LOC of 0.1 are exceeded for 15 g and 35 g mammals inhabiting those areas exposed to flurprimidol residues. These exceedances indicate that small- and medium-sized mammals may be at risk for adverse effects to survival from acute exposure to flurprimidol as a result of "banded" spray applications to ground surfaces and will be discussed in the Risk Description section.

Table V-12. Applications			uare Foot for 'T	Banded" Spray
	Size		Bro	padcast ¹
Scenario	Class (grams)	Adjusted LD50	mg/sq. ft	LD50/sq. ft
	15	1558		0.31**
0.69 lb ai/A	35	1261	7.18	0.16*
	1000	545		0.01

Bold entries indicate LOC exceedance (***exceeds the acute risk, restricted use, and endangered species LOCs; **exceeds the restricted use and endangered . species LOCs; and *exceeds the endangered species LOC)

d. Potential Risks to Birds via Broadcast and Banded Granular Applications to Ground Surfaces

Acute LD₅₀/ft²- Broadcast and Banded Granular Applications to Ground Surfaces
Since definitive acute toxicity thresholds were not established, acute avian LD₅₀/ft² was not
estimated, and the potential risk and uncertainties to birds (surrogate for reptiles and terrestrialphase amphibians) from broadcast and banded granular applications to ground surfaces are
described qualitatively in the Risk Description section.

e. Potential Risks to Mammals via Broadcast and Banded Granular Applications to Ground Surfaces

Acute LD₅₀/ft²- Broadcast and Banded Granular Applications to Ground Surfaces
Based on the available terrestrial ecotoxicity information and the predicted direct ingestion
exposures (from the T-REX model); the acute LD₅₀s/ft²s for all exposure scenarios (**Tables V-13**and V-14) exceed the acute LOCs for 15 g and 35 g mammals. These exceedances indicate that
small- and medium-sized mammals may be at risk for adverse effects to survival from acute
exposure to flurprimidol as a result of granular applications to ground surfaces and will be
discussed further in the Risk Description section.

Table V-13. Mammalian LD50 per Square Foot for Direct Ingestion of Broadcast Granular Applications on Ground Surfaces							
_	Size	Adjusted	Broa	deast			
Scenario	Class (grams)	LD ₅₀	mg/sq. ft	LD ₅₀ /sq. ft			
0.75 lb ai/A	15	1558.26	7.81	0.33**			
	35	1260.80		0.18*			

¹ T-REX does not have the capability to calculate EECs (mg/sq ft) based on "banded" applications occurring on the edge of a site; therefore, EECs are based on broadcast applications.

L	1000	545.33	<u> </u>	0.01
	15	1558.26		1.34***
3,0 lb ai/A	35	1260.80	31.24	0.71***
ļ ·	1000	545.33	1	0.06

Bold entries indicate LOC exceedance (***exceeds the acute risk, restricted use, and endangered species LOCs; **exceeds the restricted use and endangered species LOCs; and *exceeds the endangered species LOC)

Table V-14. Mammalian LD50 per Square Foot for Direct Ingestion of "Banded" Granular Applications on Ground Surfaces							
	Size	lcast ¹					
Scenario	Class (grams)	Adjusted LD ₅₀	mg/sq. ft	LD ₅₀ /sq. ft			
	15	1558.26		0.67***			
1.5 lb ai/A	35	1260.80	15.62	0.35**			
	1000	545.33		0.03			

Bold entries indicate LOC exceedance (***exceeds the acute risk, restricted use, and endangered species LOCs; **exceeds the acute restricted use and endangered species LOCs)

2. Terrestrial-phase Amphibians and Reptiles

EFED currently uses surrogate data (birds) for terrestrial amphibians and reptiles. Risks to terrestrial amphibians and reptiles from spray and granular applications to both foliar and ground surfaces are qualitatively discussed in the Risk Description section.

3. Beneficial Insects

EFED does not quantify risk to terrestrial non-target insects; however, available toxicity data indicate flurprimidol is practically non-toxic to honeybees (LD₅₀>100 μ g ai/L). Potential risks to beneficial insects from spray and granular applications are qualitatively discussed in the Risk Description section.

4. Soil-dwelling Invertebrates (Earthworm)

Available acute toxicity data for earthworm suggest that flurprimidol is practically non-toxic to soil-dwelling invertebrates on acute basis. Study results indicate that the acute toxicity threshold is greater than the highest concentrations tested (acute $LD_{50} > 100 \text{ mg}$ ai/kg). Since definitive acute toxicity threshold was not established, the acute RQ was not estimated, and the potential risk to soil-dwelling invertebrates from spray and granular applications are described qualitatively in the Risk Description section.

C. Terrestrial Plants

For this baseline assessment with terrestrial plants, RQs are derived based on ecological toxicity data for the formulation end-use product, CUTLESS 50W containing 54.89% of the active

T-REX does not have the capability to calculate EECs (mg/sq ft) based on "banded" applications occurring on the edge of a site; therefore, EECs are based on broadcast applications.

ingredient, and then compared to the EECs generated from the TerrPLANT model. RQs are calculated by comparing the toxicity values of the AI in the end-use product to TerrPLANT EECs generated based on spray and granular applications. Terrestrial EECs were derived for the use of flurprimidol based on the four scenarios developed for this baseline assessment. TerrPLANT does not have the capacity of generating EECs from banded applications and the risks to plants from banded applications will be evaluated based on broadcast applications. The potential risks to terrestrial plants are described further in the Risk Description section.

1. Non-Listed and Listed Terrestrial Plants

Terrestrial plant toxicity studies with monocots and dicots indicate that seedling emergence and vegetative vigor are impacted by exposure to flurprimidol. For the proposed new uses of flurprimidol and the maximum EECs of the use scenarios, the non-listed and listed plant LOCs were all exceeded for dicots inhabiting dry and semi-aquatic areas adjacent to treated areas as a result of runoff from broadcast spray and granular applications. In addition, the listed plant LOC was exceeded for dicots inhabiting areas adjacent to treated areas as a result of spray drift from one broadcast spray application at 0.75 lb ai/A (Table V-15).

For monocots, the LOCs were <u>not</u> exceeded for all use scenarios as a result of spray drift; however, for some of the use scenarios especially for those that inhabit in semi-aquatic areas, the non-listed and listed LOCs were all exceeded as a result of runoff.

The results indicate that monocots and dicots inhabiting terrestrial and semi-aquatic areas would be at risk for adverse effects to growth and development when exposed to flurprimidol as a result of the spray and granular application of flurprimidol to the proposed new uses.

		Non-listed RQs	S		Listed RQs	
Scenario	Terrestrial Adjacent area	Semi-aquatic Adjacent area		Terrestrial Adjacent area	Semi-aquatic Adjacent area	Drift
Broadcast Spr	ay (1 application	<u> </u>		· · · · · ·	- W	
Ground		-				" "
Monocot	0.11	0.95	<0.1	0.41	3.49	<0.1
Dicot	1.3	11.05	0.24	3.55	30.14	0.57
Monocot	0.32	2.73	<0.1	1.18	10.07	0.2
Dicot	3.75	31.88	0.68	10.23	86.93	1.63
Ground	nular Application		at 0.75 lb ai/	A)		
Monocot	0.27	2.68	<0.1	0.99	9.87	<0.1
Dicot	3.13	31.25	<0.1	8.52	85.23	<0.1
Broadčast Gra Ground	mular Application	n (1 application	at 3.0 lb ai/A)		
	1			10.05	20.45	Ι.Δ.1
Monocot	1.07	10.71	<0.1	[3.95]	39.47	<0.1

Detailed calculations for RQs and TerrPlant Ver. 1.2.2 input and output are provided in Appendix E.

VI. RISK DESCRIPTION

The risk hypothesis states that the use of flurprimidol as a plant growth regulator has the potential to compromise survivorship, reproduction, and/or growth of non-target aquatic and terrestrial animals and plants, including Federally-listed endangered and threatened species. Based on the available ecotoxicity data and predicted environmental exposures, this ecological risk assessment supports the presumption of acute and chronic risks to mammals foraging the assessed feed items with flurprimidol residues and the risk from ingestion of granules. In addition, risk is presumed for terrestrial dicots and monocots and aquatic vascular plants inhabiting areas adjacent to the treated areas exposed to flurprimidol as a result of runoff and spray drift. In contrast, the presumption of acute and chronic risks to birds, terrestrial-phase amphibians, reptiles, insects, soil-dwelling invertebrates, fish, aquatic invertebrates, and aquatic non-vascular plants (green algae) are not supported by the results of this baseline risk assessment.

A. Risks to Non-target Aquatic Animals and Plants

In the conceptual model, spray drift and surface runoff/leaching to adjacent bodies of water were predicted as the most likely sources of exposure of flurprimidol to non-target aquatic animals and plants. Risks to aquatic organisms and plants were assessed based on modeled estimated environmental concentrations (EECs) and available toxicity data. Aquatic EECs for the

² Non-listed toxicity thresholds (EC₂₅) were 0.14 lb ai/A, 0.012 lb ai/A, 0.42 lb ai/A, and 0.01 llb ai/A for seedling emergence monocot, seedling emergence dicot, vegetative vigor monocot, and vegetative vigor dicot, respectively.

³ Listed toxicity thresholds (NOAEC) were 0.038 lb ai/A, 0.0044, 0.11, 0.0046 lb ai/A for seedling emergence monocot, seedling emergence dicot, vegetative vigor dicot And vegetative vigor monocot, respectively.

ecological exposure to flurprimidol were estimated using GENEEC2 (Table III-3) and PRZM/EXAMS (Table III-5).

1. Aquatic Organisms

There are no acute or chronic LOC exceedances for fish and invertebrates based on the most conservative aquatic exposure scenario among a suite of use scenarios assessed; thus, fish and invertebrates, including Federally-listed endangered and threatened species, there are no indication of adverse effects to survival, reproduction, and/or growth for fish and invertebrates from acute and chronic exposure to flurprimidol as a result of the labeled uses.

2. Aquatic-phase Amphibians

EFED currently uses surrogate data (freshwater fish) for non-target aquatic-phase amphibians. There were no LOC exceedances for acute or chronic risk to freshwater fish; thus, there is no indication of adverse effects to survival, reproduction, and/or growth for aquatic-phase amphibians from exposure to flurprimidol as a result of the labeled uses.

3. Aquatic Plants

There is only one aquatic non-vascular plant study out of four aquatic non-vascular plant studies available for flurprimidol; the green algae study indicates that flurprimidol affects biomass. The aquatic vascular plant study with duckweed indicates that flurprimidol affects all endpoints with frond density the most affected. Based on the use scenarios assessed and the available toxicity information, the non-listed and listed plant LOCs (LOC >1) were exceeded for duckweed (RQs range from 1.4 to 16) but not exceeded for green algae (RQs range from 0.14 to 0.49; Table VI-1). There is some uncertainty regarding the potential risk specifically to aquatic vascular plants because flurprimidol regulates plant growth without killing the plants as seen in the toxicity studies with duckweed and green algae. Thus, it is possible that flurprimidol is not lethal to aquatic plants. It is uncertain of the impact on endangered and threatened aquatic vascular plants inhabiting water bodies adjacent to treated areas when exposed to flurprimidol as a result of spray drift and runoff. However, when those non-target plants come into contact with flurprimidol, it is anticipated that reduced growth or a delay in growth will be observed, but it is uncertain how flurprimidol will affect one's ability to survive, grow, and reproduce.

B. Risks to Non-target Terrestrial Animals and Plants

In the conceptual model, ground deposition of liquid and granular formulations, spray drift, and wind erosion of soil particles with resulting residues on foliage and on flowers and seeds, including granules on the ground are the most likely sources of flurprimidol exposure to non-target terrestrial animals, including listed species. Risks to terrestrial animals and plants were assessed based on modeled EECs and available toxicity data. As part of the terrestrial assessment, exposure concentrations of flurprimidol to non-target terrestrial plants and animals were modeled according to the labeled application rates for ornamentals and turfgrasses. For terrestrial birds and mammals, estimates of upper-bound levels of flurprimidol residues on various food items and granules, which may be contacted or consumed by wildlife, were

determined using the Fletcher nomogram followed by a first order decline model TREX 1.4.1. Risk to soil-dwelling invertebrates was determined by estimating the amount of flurprimidol residues in soil. Likewise, the TerrPlant 1.2.2 model was used to estimate exposure to non-target plants.

1. Birds

a. Potential Acute Risks from Broadcast and Banded Spray
Applications to Foliar and Ground Surfaces and Direct Ingestion
of Granules

Since definitive acute oral and dietary toxicity thresholds were not established in the submitted studies, acute avian RQs were not estimated for birds (surrogate for reptiles and terrestrial-phase amphibians). Flurprimidol is categorized as practically non-toxic on an oral and dietary basis to two avian species (acute $LD_{50} > 2000$ mg ai/kg-bw; >4310 mg ai/kg-diet).

Because acute avian ROs were not estimated due to non-definitive acute toxicity thresholds to be certain the "greater than" concentrations were tested high enough in the acute avian studies to be protective of non-listed and listed species, these acute values for birds were compared with an exposure value to determine if the EEC is greater than 1/10th or ½ of the highest concentrations tested. The highest T-REX dosed-based EEC for birds is 567 mg/kg bw for short grass consumed by a 20 g bird selected from the maximum exposure scenario following four spray applications at 0.75 lb ai/A with a 14-day interval. A comparison of the adjusted LD50 for 20 g birds of >1440 mg ai/kg-bw with the T-REX dose-based EEC (567 mg/kg) indicates a 2.5-fold difference between the highest EEC and the concentrations which produced a lethal effect on 50% of the birds species. For that reason, there is an uncertainty for listed bird species (the LOC for listed bird species is 0.1) because the dose-based EEC is greater than 1/10th of the highest dose tested in the studies. Also, a comparison of the dietary LC50 with the highest dietary-based EEC indicates a 8.5-fold difference and because the dietary-based EEC is greater than 1/10th of the highest dose tested, the uncertainty for listed birds also exists on a dietary basis. None of the dose- or dietary-based EECs was greater than half of the highest doses tested; thus, there are no concerns for non-listed bird species (the LOC for non-listed bird species is 0.5).

With an uncertainty for listed bird species, risk is expected to be minimal for birds foraging any of the selected food items, earthworms, or granules with flurprimidol residues; avian species are likely not at risk for adverse effects to survival from acute oral or dietary exposures to flurprimidol as a result of the labeled uses.

b. Potential Chronic Risks from Broadcast and Banded Spray Applications to Foliar and Ground Surfaces.

For broadcast spray applications to foliar surfaces using the maximum (four applications at 0.75 lb ai/A with a two-week reapplication interval) and minimum (twelve applications at 0.26 lb ai/A with a two-week reapplication interval) exposure scenarios with upper bound EECs and an NOAEC of 309 mg ai/kg-diet, the chronic LOC is exceeded only when the maximum scenario is assumed. With four broadcast spray applications at 0.75 lb ai/A, the RQ of 1.6 for birds feeding on short grass exceeds the chronic LOC of 1. However, there are no LOC exceedances for birds

feeding on the other assessed feed items for the maximum scenario and for birds feeding on all the assessed feed items when the minimum exposure scenario is assumed. Although there is an exceedance of the chronic LOC based on the maximum exposure scenario, the potential risk for adverse effects to growth and reproduction is based on the assumption that birds occupy the area permanently and are feeding on short grass exclusively within the treated areas where turfgrasses are grown. To the extent that those birds do not reside permanently within the treated area, exposure will be less and risk is presumably less. In addition, there are no LOC exceedances for both scenarios when the mean EECs are assumed.

Chronic risks to birds from banded spray applications to ground surfaces are not estimated due to model limitations; given that banded sprays are applied along the perimeter of lawns, landscape beds, sidewalks, curbs, parking lots, driveways, posts, mailboxes, building structures, and other similar areas where turfgrasses are grown rather than on an one-acre field as T-REX assumes; exposure to birds from banded applications will be lower than broadcast applications; thus, risk will be presumably less but not ruled out since the LOC was exceeded for broadcast applications.

c. Potential Chronic Risks from Direct Ingestion of Granules

EFED has no standard methodology for assessing chronic risk to birds from granular applications. The following chronic exposure estimation and risk characterization for birds considers granular routes of exposure including direct ingestion of soil invertebrates that have bioconcentrated pesticide residues of granules in soil; thus, EFED has taken further steps to characterize the potential for chronic risk to avian species exposed to flurprimidol granules. Based on the highest EEC of flurprimidol in earthworm tissue (35 µg a.i./kg) and lowest avian NOAEC of 309 mg a.i./kg-diet, the chronic LOC is not exceeded (Table VI-2) and is 8800x lower than the modeled EEC for insectivorous birds exposed to flurprimidol granules via ingestion of earthworms at the maximum application rate of 3.0 lb a.i./A (see Appendix D). For birds, direct consumption of granules and dose-based risk quotients for direct consumption of earthworm are not calculated for the chronic risk estimation, the risks are unknown.

Table VI-2. Dietary-based Chronic RQ for Insectivorous Birds						
Application Rate	Body Weight (g)	Earthworm EEC (mg/kg-earthworm)	NOAEC (mg a.i./kg)	Chronic RQ ^a		
3.0 lb a.i./A	All	0,035	309	<0.1		

^a Chronic RQ = Earthworm EEC / NOAEC.

2. Terrestrial-phase Amphibians and Reptiles

a. Potential Acute Risks from Broadcast and Banded Spray Applications to Foliar and Ground Surfaces and Direct Ingestion of Granules

EFED currently uses data on surrogate species (birds) to assess non-target terrestrial-phase amphibians and reptiles. Based on the evaluation of potential acute risks to birds, potential acute risks to reptiles and terrestrial-phase amphibians are also lower than the Agency's listed species level of concern. Thus, reptiles and terrestrial-phase amphibians would not be at risk for adverse

effects on survival from granular or foliar consumption. However, the evaluation also indicates there is an uncertainty for listed reptiles and amphibians because the upper bound EECs were higher than $1/10^{th}$ of the highest doses tested in the acute oral and dietary studies with birds.

b. Potential Chronic Risks from Broadcast Spray Applications to Foliar and Ground Surfaces.

Based on the evaluation of potential chronic risks to birds from foliar sprays, potential chronic risks to reptiles and terrestrial-phase amphibians are also higher than the Agency's listed species level of concern. Thus, reptiles and terrestrial-phase amphibians would be at risk for adverse effects on reproduction and growth from foliar consumption. Similar to birds, exposure to reptiles and terrestrial-phase amphibians from banded applications to ground surfaces will be lower than broadcast applications; thus, risk will be presumably less but not ruled out.

c. Potential Chronic Risks from Direct Ingestion of Granules

Based on the evaluation of potential chronic risks to birds from ingestion of soil invertebrates as one of the granular routes, potential chronic risks to reptiles and terrestrial-phase amphibians are also lower than the Agency's listed species level of concern. Thus, reptiles and terrestrial-phase amphibians would not be at risk for adverse effects on reproduction and growth from indirect granule (soil invertebrate) consumption with flurprimidol residues. However, the chronic risk from direct granule consumption is unknown.

3. Mammals

a. Potential Acute Risks from Broadcast Spray Applications to Foliar Surfaces

Acute RQs – Broadcast Spray Applications to Foliar Surfaces (Reg. No. 67690-15, Cutless 50W Turf Growth Regulator)

Based on the maximum exposure scenario (four broadcast spray applications of 0.75 lb ai/A with a reapplication interval of 2 week) using Cutless 50W Turf Growth Regulator (Reg. No. 67690-15) and maximum predicted EECs, the acute mammalian dose-based risk quotients for broadcast spray applications to foliar surfaces exceed the acute restricted use and endangered species LOCs for 15 g and 35 g mammals consuming short grass and the endangered species LOC is exceeded for 1000 g mammals consuming short grass and for 15 g and 35 g mammals consuming tall grass, broadleaves and small insects. In addition, there is an exceedance of the endangered species LOC for 15g mammals consuming short grass when mean predicted EECs are assumed.

A closer look of the terrestrial assessment indicates that for 15 g mammals feeding on short grass, the endangered species LOC is exceeded if flurprimidol is applied at least once and for 35 g mammals feeding on short grass, it requires two or more applications to exceed the LOC. It requires three or more applications for potential risk to 1000 g mammals feeding on short grass with residues of the active ingredient.

For the lower (minimum) exposure scenario (12 broadcast spray applications of 0.26 lb ai/A with a reapplication interval of 2 week) and maximum predicted EECs, the endangered species LOC

is exceeded for 15g and 35g mammals consuming short grass. However, there are no LOC exceedances with mean predicted EECs.

b. Potential Acute Risks from Banded Spray Applications to Ground Surfaces

Acute LD₅/ft² – Banded Spray Applications to Ground Surfaces (Reg. No. 67690-46, SP5075 Turf Growth Regulator)

Based on the maximum exposure scenario for banded spray applications to ground surfaces using the SP5075 Turf Growth Regulator product and intermediate EECs, the acute mammalian LD_{50}/ft^2 exceed the acute restricted use and endangered species LOCs for 15 g mammals while the endangered species LOC is exceeded for 35 g mammals inhabiting the treated areas where flurprimidol is applied to the ground. The RQs ranged from 0.01 to 0.31 for a banded spray application to ground surface at 0.69 lb a.i./A, respectively, with small-sized mammals affected the most when exposed.

c. Potential Acute Risks from Direct Ingestion of Granules

Acute LD₅/ft² – Broadcast Granular Applications to Ground Surfaces (Reg. No. 67690-19, Turf Fertilizer – Contains Cutless 0.5% and Reg. No. 67690-13, Cutless 0.33G Landscape Growth Regulator)

Based on one broadcast application of granules at 3.0 lb a.i./A using either the turf fertilizer (Reg. No. 67690-19) or landscape regulator (Reg. No. 67690-13) product and intermediate EECs, the acute risk, restricted use, and endangered species LOCs are exceeded for 15 g and 35 g mammals inhabiting the treated areas. However, for broadcast applications of granules to ground surfaces at 0.75 lb a.i./A and 3-week intervals, the restricted use and endangered species LOCs are exceeded for 15 g mammals and the endangered species LOC is exceeded for 35 g mammals.

Acute LD_{5}/ft^2 – Banded Granular Applications to Ground Surfaces (Reg. No. 67690-44, Turf Fertilizer – Contains Cutless 0.17% and Reg. No. 67690-13, Cutless 0.33G Landscape Growth Regulator)

Based on banded applications of granules at 1.5 lb a.i./A and 8-week intervals using either the turf fertilizer (Reg. No. 67690-44) or landscape regulator (Reg. No. 67690-13) product and intermediate EECs, the RQ of 0.67 for 15 g mammals exceed the acute risk, restricted use, and endangered species LOCs, the RQ of 0.35 for 35 g mammals exceed the acute restricted use and endangered species LOCs, and the RQ of 0.03 for 1000 g mammals does not exceeded any of the LOCs.

d. Number of Granules Needed to be Consumed by a Mammal to Achieve Toxicity Thresholds

To better characterize the risks to mammals, this baseline risk assessment also estimates the minimum foraging area (square feet) needed to allow for direct ingestion of sufficient mass of flurprimidol granules to achieve a dose that exceeds the adjusted LD₅₀ by assuming that a mammal consumes 100%, 50% or 10% of the available granules depending on mammal's weight

class. In order to derive a first approximation of acute exposure and risk to granular flurprimidol for mammals that may directly consume granules, the TREX model takes into account that 100% of mammal's diet is comprised of granules. Therefore, EFED has taken further steps to characterize the potential for acute risk to mammalian species by evaluating how much area would need to be foraged to achieve the amount of flurprimidol granules necessary to trigger the Agency's Levels of Concern (LOCs). **Tables VI-3, VI-4, and VI-5** calculate the number of granules and minimum foraging area needed to exceed Agency's LOCs at 0.75 lb a.i/A, 1.5 lb a.i./A, and 3.0 lb a.i./A granular flurprimidol.

Table VI-3. Estimates of the number of granules, and minimum area foraged needed for a 15g, 35g, and 1000g mammal to achieve the EEC that would trigger an exceedance of the adjusted LD50, acute risk LOC (0.5), and endangered species risk (0.5) levels of concern (LOCs) based on an application rate of 0.75 lb a.i./A

		Mammal Size (grams)		rams)
		15	35	1000
	Adjusted LD ₅₀	24	44	545
No. of Consumed Granules Required to Reach the Specified LOC	Acute Risk LOC (0.5)	12	22	273
	Endangered Species LOC (0.1)	3	5	55
Area of Field to be Foraged (square feet) to	Assuming a 100% Feeding Efficiency	0.3	0.6	7
Achieve the Endangered Species LOC Based on Application Rate of 0.75 lb/A.*	Assuming a 50% Feeding Efficiency	0.6	1	14
on Application Rate of 0.15 lb/A.	Assuming a 10% Feeding Efficiency	3.0	6	70

^{*} Immediate EEC = 7.81 mg/square feet (excluding row spacing, bandwidth, and # of rows input parameters)

In **Table VI-3** above, it was estimated that it would take a 15g mammal to consume 3 granules that would result in an exceedance of the endangered species LOC. Based on the application rate of 0.75 lb/A, this number of granules could be gleaned from 0.3, 0.6, or 3 square feet (within the treated band) when assuming a 100%, 50%, or 10% feeding efficiency, respectively. To achieve an EEC equivalent dose that would result in an exceedance of the endangered species LOC, a 1000g mammal would have to consume 55 granules. It was estimated that this number of granules could be consumed in an area of 7, 14, or 70 square feet when assuming a 100%, 50%, or 10% feeding efficiency, respectively.

Table VI-4 calculates the number of granules and minimum foraging area needed to exceed Agency's LOCs at the minimum application rate of 1.5 lb/A granular flurprimidol.

	Table VI-4. Estimates of the number of granules, and minimum area foraged needed for a 15g, 35g, and
i	1000g mammal to achieve the EEC that would trigger an exceedance of the adjusted LD50, acute risk
I	LOC (0.5), and endangered species risk (0.5) levels of concern (LOCs) based on an application rate of 1.5
١	Ib/A

		Mammal Size (grams)		
		15	35	1000
No. of Consumed Granules Required to Reach the Specified LOC	Adjusted LD ₅₀	24	44	545
	Acute Risk LOC (0.5)	12	22	273
the specifica 200	Endangered Species LOC (0.1)	3	5	55
Area of Field to be Foraged (square feet) to Achieve the Endangered Species LOC Based	Assuming a 100% Feeding Efficiency	0.15	0.28	4

on Application Rate of 1.5 lb/A.*	Assuming a 50% Feeding Efficiency	0.3	0.57	7
	Assuming a 10% Feeding Efficiency	1.5	2.83	35

^{*} Immediate EEC = 15.62 mg/square fect (excluding row spacing, bandwidth, and # of rows input parameters)

In **Table VI-4** above, it was estimated that it would take a 15g mammal to consume 3 granules that would result in an exceedance of the endangered species LOC. Based on the application rate of 1.5 lb/A, this number of granules could be gleaned from 0.15, 0.3, or 1.5 square feet (within the treated band) when assuming a 100%, 50%, or 10% feeding efficiency, respectively. To achieve an EEC equivalent dose that would result in an exceedance of the endangered species LOC, a 1000g mammal would have to consume 55 granules. It was estimated that this number of granules could be consumed in an area of 4, 7, or 35 square feet when assuming a 100%, 50%, or 10% feeding efficiency, respectively.

Table VI-5 calculates the number of granules and minimum foraging area needed to exceed Agency's LOCs at the minimum application rate of 3.0 lb/A granular flurprimidol.

	Table VI-5. Estimates of the number of granules, and minimum area foraged needed for a 15g, 35g, and
i	1000g mammal to achieve the EEC that would trigger an exceedance of the adjusted LD50, acute risk
	LOC (0.5), and endangered species risk (0.5) levels of concern (LOCs) based on an application rate of 3.0
	Ib/A

		Mammal Size (grams)		
	i	15	35	1000
No. of Conguested Granules Paguined to Book	Adjusted LD ₅₀	24	44	545
No. of Consumed Granules Required to Reach the Specified LOC	Acute Risk LOC (0.5)	12	22	273
the opecined 200	Endangered Species LOC (0.1)	3	5	55
Area of Field to be Foraged (square feet) to	Assuming a 100% Feeding Efficiency	0.07	0.14	1.75
Achieve the Endangered Species LOC Based on Application Rate of 3.0 lb/A.*	Assuming a 50% Feeding Efficiency	0.15	0.28	3.5
on Application Rate of 5.0 lb/A.	Assuming a 10% Feeding Efficiency	0.75	1.4	17.5

^{*} Immediate EEC = 31.24 mg/square feet (excluding row spacing, bandwidth, and # of rows input parameters)

In **Table VI-5** above, it was estimated that it would take a 15g mammal to consume 3 granules that would result in an exceedance of the endangered species LOC. Based on the application rate of 3.0 lb/A, this number of granules could be gleaned from 0.07, 0.15, or 0.75 square feet (within the treated band) when assuming a 100%, 50%, or 10% feeding efficiency, respectively. To achieve an EEC equivalent dose that would result in an exceedance of the endangered species LOC, a 1000g mammal would have to consume 55 granules. It was estimated that this number of granules could be consumed in an area of 1.75, 3.5, or 17.5 square feet when assuming a 100%, 50%, or 10% feeding efficiency, respectively.

e. Potential Chronic Risks from Broadcast Spray Applications to Foliar Surfaces

Chronic RQs - Broadcast Spray Applications to Foliar Surfaces (Reg. No. 67690-15, Cutless 50W Turf Growth Regulator)

Based on the maximum exposure scenario (four broadcast spray applications of 0.75 lb ai/A with a reapplication interval of 2 week) using Cutless 50W Turf Growth Regulator (Reg. No. 67690-15) and maximum predicted EECs, the chronic mammalian dose-based risk quotients for broadcast spray applications to foliar surfaces exceed the Chronic LOC for mammals of all weight classes consuming all the assessed feed items except for 1000 g mammals consuming fruits, seeds, and large insects. In addition, there is an exceedance of the Chronic LOC for mammals of all weight classes consuming all assessed feed items except fruits, seeds, and large insects when mean predicted EECs are assumed.

A closer look of the terrestrial assessment indicates that for 15 g, 35 g, and 1000 g mammals feeding on any of the assessed feed items except fruits, seeds, and large insects, the chronic LOC is exceeded after one application of flurprimidol.

For the lower (minimum) exposure scenario (12 broadcast spray applications of 0.26 lb ai/A with a reapplication interval of 2 week) and maximum predicted EECs, the Chronic LOC is exceeded for mammals of all weight classes consuming all the assessed feed items except for fruits, seeds, and large insects. However, the mean predicted EECs did not remove the LOC exceedances for mammals of all weight classes consuming short grass, tall grass, broadleaves, and small insects.

f. Potential Chronic Risks from Banded Spray Applications to Ground Surfaces

Chronic LD_{So}ft² – Banded Spray Applications to Ground Surfaces (Reg. No. 67690-46, SP5075 Turf Growth Regulator)

Chronic risks to mammals from banded spray applications to ground surfaces are not estimated due to model limitations; given that banded sprays are applied along the perimeter of lawns, landscape beds, sidewalks, curbs, parking lots, driveways, posts, mailboxes, building structures, and other similar areas where turfgrasses are grown rather than on an one-acre field as T-REX assumes; exposure to mammals from banded applications will be lower than broadcast applications; thus, risk will be presumably less but not ruled out since the RQs were high for broadcast applications.

g. Potential Chronic Risks from Direct Ingestion of Granules

Similar to birds, EFED has no standard methodology for assessing chronic risk to mammals from granular applications. The following chronic exposure estimation and risk characterization for mammals considers granular routes of exposure including direct ingestion of soil invertebrates that have bioconcentrated pesticide residues of granules in soil; thus, EFED has taken further steps to characterize the potential for chronic risk to mammalian species exposed to flurprimidol granules. Based on the highest EEC of flurprimidol in earthworm tissue (35 µg a.i./kg) and lowest mammalian NOAEC of 100 mg a.i./kg-diet, the chronic LOC is not exceeded (Table VI-6) and is 2860x lower than the modeled EEC for insectivorous mammals exposed to flurprimidol granules via ingestion of earthworms at the maximum application rate of 3.0 lb a.i./A (see Appendix D). Similar to birds, direct consumption of granules and dose-based risk quotients for direct consumption of earthworm are not calculated for the chronic risk estimation, the risks are unknown.

Table VI-6. Dietary-based Chronic RQ for Insectivorous Mammals					
Application Rate	Body Weight (g)	Earthworm EEC (mg/kg-earthworm)	NOAEC (mg a.i./kg)	Chronic RQ ^a	
3.0 lb a.i./A	All	0.035	001	<0.1	

^a Chronic RQ = Earthworm EEC / NOAEC.

4. Soil-Dwelling Invertebrates

Since a definitive acute toxicity threshold was not established in the submitted earthworm study, acute soil invertebrates RQs were not estimated for earthworm. Flurprimidol is categorized as practically non-toxic on an acute basis to earthworms (acute LD₅₀ >100 mg ai/kg). Risk is expected to be minimal for soil-dwelling invertebrates burrowing soils with flurprimidol residues; soil-dwelling invertebrate species are not at risk for adverse effects to survival from acute exposure to flurprimidol as a result of the labeled uses.

5. Beneficial Insects

The available terrestrial insect toxicity data, based on tests with honeybees, suggest that flurprimidol is practically non-toxic to bees on an acute contact basis. The LD₅₀ value was >100 µg ai/bee. Risk to beneficial insects in the direct treatment area exposed to the AI is expected to be minimal; consequently, precautionary labeling for honeybee protections is not required at this time.

6. Terrestrial Plants

Based on the use scenarios assessed and the available toxicity information, the non-listed and listed plant LOCs (LOC >1) were exceeded for terrestrial plants exposed to flurprimidol (Table V-16), depending on which label is used. For instance, spray drift is not a concern for flurprimidol except when a 0.75 lb a.i./A foliar spray is applied. The listed plant LOC was exceeded for all use scenarios with the exception of monocots in dry areas based on one broadcast foliar application at 0.26 lb ai/A and one broadcast application of granules at 0.75 lb ai/A. There is some uncertainty regarding the potential risk to terrestrial plants because flurprimidol regulates plant growth without killing the plants as seen in the seedling emergence and vegetative vigor toxicity studies with monocots and dicots. Thus, it is possible that flurprimidol is not lethal to terrestrial plants. It is uncertain of the impact on endangered and threatened plants inhabiting areas adjacent to treated areas when exposed to flurprimidol as a result of spray drift and runoff. However, when those plants come in contact with flurprimidol, it is anticipated that reduced growth or a delay in growth will be observed, but it is uncertain how flurprimidol will affect one's ability to survive, grow, and reproduce.

C. Review of Incident Data

A search of the EIIS (Environmental Incident Information System) database for ecological incidents (searched on April 5, 2010) reported no adverse ecological incidents.

D. Endocrine Disruptor Screening Program

As required under FFDCA section 408(p), EPA has developed the Endocrine Disruptor Screening Program (EDSP) to determine whether certain substances (including pesticide active and other ingredients) may have an effect in humans or wildlife similar to an effect produced by a "naturally occurring estrogen, or other such endocrine effects as the Administrator may designate." The EDSP employs a two-tiered approach to making the statutorily required determinations. Tier 1 consists of a battery of 11 screening assays to identify the potential of a chemical substance to interact with the estrogen, androgen, or thyroid (E, A, or T) hormonal systems. Chemicals that go through Tier 1 screening and are found to have the potential to interact with E, A, or T hormonal systems will proceed to the next stage of the EDSP where EPA will determine which, if any, of the Tier 2 tests are necessary based on the available data. Tier 2 testing is designed to identify any adverse endocrine related effects caused by the substance, and establish a dose-response relationship between the dose and the E, A, or T effect.

Between October 2009 and February 2010, EPA is issuing test orders/data call-ins for the first group of 67 chemicals, which contains 58 pesticide active ingredients and 9 inert ingredients. This list of chemicals was selected based on the potential for human exposure through pathways such as food and water, residential activity, and certain post-application agricultural scenarios. This list should not be construed as a list of known or likely endocrine disruptors.

Flurprimidol is not among the group of 58 pesticide active ingredients on the initial list to be screened under the EDSP. Under FFDCA sec. 408(p) the Agency must screen all pesticide chemicals. Accordingly, EPA anticipates issuing future EDSP test orders/data call-ins for all pesticide active ingredients.

For further information on the status of the EDSP, the policies and procedures, the list of 67 chemicals, the test guidelines and the Tier 1 screening battery, please visit our website: http://www.epa.gov/endo/.

E. Federally Threatened and Endangered (Listed) Species Concerns

Section 7 of the Endangered Species Act, 16 U.S.C. Section 1536(a)(2), requires all federal agencies to ensure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of a listed species or result in destruction or adverse modification of designated critical habitat. To jeopardize the continued existence of a listed species means "to engage in an action that reasonably would be expected, directly or indirectly, to reduce appreciably the likelihood of both the survival and recovery of a listed species in the wild by reducing the reproduction, numbers, or distribution of the species" (50 CFR 402.02).

To facilitate compliance with the requirements of the Endangered Species Act (subsection (a)(2)), the Office of Pesticide Programs has established procedures to evaluate whether a proposed registration action may direct or indirectly appreciably reduce the likelihood of both the survival and recovery of a listed species (USEPA, 2004.). After the Agency's baseline risk assessment is conducted, if any of the Agency's listed species LOCs are exceeded for either

direct or indirect effects, an analysis is conducted to determine if any listed or candidate species could be contaminated from runoff/erosion or direct ingestion of granules. If listed or candidate species may be present in the proposed action area, further biological assessment is undertaken. The extent to which listed species may be at risk is considered, which then determined the need for development of a more comprehensive consultation package, as required by the Endangered Species Act.

The federal action addressed herein is the proposed registration for nationwide use of flurprimidol on turf grass and ornamentals. According to the USDA National Agricultural Statistics Service (NASS) 2002 census, the proposed uses are likely to found everywhere in the States, especially golf courses and athletic fields.

1. Action Area

For listed species assessment purposes, the action area is considered to be the area affected directly or indirectly by the Federal action and not merely the immediate area involved in the action. At the initial baseline, the risk assessment considers broadly described taxonomic groups and so conservatively assumes that listed species within those broad groups are co-located with the pesticide treatment area. This means that terrestrial plants and wildlife are assumed to be located on or adjacent to the treated site and aquatic animals and plants are assumed to be located in a surface water body adjacent to the treated site. The assessment also assumes that the listed species are located within an assumed area that has the relatively highest potential exposure to the pesticide, and that exposures are likely to decrease with distance from the treatment area.

At this time EFED cannot make a "no effect" or "may effect" determination if the assumptions associated with the baseline action area result in RQs that are below or above the listed species LOCs since the Service(s) has not identified which listed species and critical habitat are potentially implicated. Furthermore, if RQs are below the listed species LOCs for a given taxonomic group, this may indicate a "no concern" for indirect effects upon listed species that depend upon the taxonomic group covered by the RQ as a resource. However, in situations where the baseline assumptions lead to RQs in excess of the listed species LOCs for a given taxonomic group, a potential for a "may affect" conclusion could exist and may be associated with direct effects on listed species belonging to that taxonomic group or may extend to indirect effects upon listed species that depend upon that taxonomic group as a resource. In such cases, additional information on the biology of listed species, the locations of these species, and the locations of use sites could be considered along with available information on the fate and transport properties of the pesticide to determine the extent to which baseline assumptions regarding an action area apply to a particular listed animal. These subsequent refinement steps could consider how this information would impact the action area for a particular listed animal and may potentially include areas of exposure that are downwind and downstream of the pesticide use site.

2. Taxonomic Groups Potentially at Risk

The baseline risk assessment for listed species indicates these following taxonomic groups are potentially at risk when exposed to flurprimidol (Table I-1).

- Chronic risk to birds from foraging on short grass with flurprimidol residues following four broadcast sprays of 0.75 lb a.i./A with a two-week reapplication interval:
- Acute and chronic risks to mammals from foraging on assessed feed items following any of the broadcast and banded spray applications;
- Acute risk to 15 g and 35 g mammals from ingestion of granules following any of the broadcast and banded granular applications;
- Risks to seedling emergence and vegetative vigor of monocots and dicots when exposed to flurprimidol as a result of runoff and spray drift following any application; and
- Risks to aquatic vascular plants when exposed to flurprimidol as a result of runoff and spray drift following any application.

a. Discussion of Risk Quotients

The Agency's LOC for endangered birds (surrogate for terrestrial-phase amphibians and reptiles), mammals, and terrestrial and aquatic vascular plants is exceeded for the use of flurprimidol as outlined in previous sections. Should estimated exposure levels occur in proximity to listed resources, the available baseline information may suggest a potential concern for direct effects on listed species within these taxonomic groups listed above associated with the currently supported uses of flurprimidol.

3. Indirect Effects Analysis

Modeled exposures for the following taxonomic groups indicate LOC exceedances for birds and mammals; consequently, there is a potential for indirect effects to listed species dependent upon birds and mammals for food, pollination or seed dispersal, or using burrows or cover requirements for shelter and breeding habitat. In addition, since birds serve as the surrogate for terrestrial-phase amphibians and reptiles, there is concern for potential indirect effects to listed species dependent on listed terrestrial-phase amphibians and reptiles.

In addition, the listed plant LOC was exceeded for terrestrial and aquatic vascular plants; there is a concern for potential indirect effects to listed species dependent on terrestrial and/or aquatic vascular plants for habitat, feeding, or cover requirements.

4. Critical Habitat

In the evaluation of pesticide effects on designated critical habitat, consideration is given to the physical and biological features (constituent elements) of a critical habitat identified by the U.S Fish and Wildlife and National Marine Fisheries Services as essential to the conservation of a listed species and which may require special management considerations or protection. The evaluation of impacts for a baseline pesticide risk assessment focuses on the biological features that are constituent elements and is accomplished using the baseline taxonomic analysis (risk quotients, RQs) and listed species levels of concern (LOCs) that are used to evaluate direct and indirect effects to listed animals.

The baseline risk assessment has identified potential concerns for indirect effects on listed species for those animals and plants dependant upon birds, terrestrial-phase amphibians, reptiles, mammals, terrestrial plants, and aquatic vascular plants. In light of the potential for indirect effects, the next step for EPA and the Service(s) is to identify which listed species and critical habitat are potentially implicated. Analytically, the identification of such species and critical habitat can occur in either of two ways. First, the agencies could determine whether the action area overlaps critical habitat or the occupied range of any listed species. If so, EPA would examine whether the pesticide's potential impacts on non-listed species would affect the listed species indirectly or directly affect a constituent element of the critical habitat. Alternatively, the agencies could determine which listed species depend on biological resources, or have constituent elements that fall into, the taxa that may be directly or indirectly impacted by the pesticide. Then EPA would determine whether use of the pesticide overlaps the critical habitat or the occupied range of those listed species. At present, the information reviewed by EPA does not permit use of either analytical approach to make a definitive identification of species that are potentially impacted indirectly or critical habitats that is potentially impacted directly by the use of the pesticide. EPA and the Service(s) are working together to conduct the necessary analysis.

This baseline risk assessment for critical habitat provides a listing of potential biological features that, if they are constituent elements of one or more critical habitats would be of potential concern. These correspond to the taxa identified above as being of potential concern for indirect effects and include the following: birds, reptiles, terrestrial-phase amphibians, mammals, aquatic vascular plants and terrestrial plants. This list should serve as an initial step in problem formulation for further assessment of critical habitat impacts outlined above, should additional work be necessary.

5. Direct Effect Co-occurrence Analysis

For the proposed uses of flurprimidol, LOCATES was run for all listed birds, reptiles, terrestrial-phase amphibians, mammals, terrestrial plants, and aquatic vascular plants to determine the potential for co-occurrence of listed animal and plant species located within areas of expected pesticide use. When baseline assessment information suggests that a listed species occurs in counties where a pesticide is used, there is a potential for a direct effect from flurprimidol use, should exposure actually occur. The taxa that reside in those areas, and the basis for the designation, are in **Table VI-7** and **Appendix F**. Additional analysis of listed animal and plants locations, refinement of the action area associated with flurprimidol regulatory decisions, and the biology of the potentially affected species would be needed before an effects determination can be made for any of the co-located species identified by this assessment.

LOCATES is used to preliminarily identify areas where listed animals and plants could be located within the counties in USA where the proposed uses for flurprimidol are labeled. However, LOCATES does not include county-level location information for non-crop uses, the preliminary analysis was not performed to identify those areas. Consequently, based on the information available at this step in the assessment process, it is presumed that all listed bird, terrestrial-phase amphibian, reptile, mammals, terrestrial plant, and aquatic plant species are potentially directly affected from flurprimidol uses for where turf grasses and ornamentals are

grown. Such potential concerns are limited by the true potential for exposures of critical resources to modeled flurprimidol levels. LOCATES identified >1200 endangered/threatened bird, terrestrial-phase amphibian, reptile, mammals, terrestrial plant, and aquatic plant species located in areas where turf grasses and ornamentals are grown. Consequently, based on the information available, it is presumed listed species reside in areas of expected pesticide use (Table VI-7).

Table VI-7. Number of Listed Species Located Where Turf Grass and Ornamentals are Grown in the United States of America.						
Non-crop	No. of Affected States	No. of Species				
Turf grass and ornamentals	All	>1200				

6. Indirect Effect Co-occurrence Analysis

In accordance with established procedures, such findings suggest a potential concern for indirect effects to listed animal and plant species with both narrow (i.e., species that are obligates or have very specific habitat or feeding requirements) and general dependencies (i.e., cover type requirements) on plants or animals as a resource or important habitat component. This analysis considered all animal and plant taxonomic groups (i.e., mammal, bird, amphibian, reptile, fish, crustacean, mollusks, arachnid, insect, dicot, monocot, ferns, conf/cycds, and lichen) that depend on those listed animal species; terrestrial and aquatic plants that require birds as pollinators or seed dispersers; species that require reptile burrows for shelter or breeding habitats; and aquatic animals and plants that require cover requirements. Again, no county-level analysis was performed for the non-crop uses. The animal and plant species that reside in those areas and the basis for the designation are summarized in Table VI-8, below. Such potential concerns are limited by the true potential for exposures of critical animal and plant species resources to modeled flurprimidol levels and the relationship between 'directly affected' listed species and 'indirectly affected' listed species. Consequently, additional analysis of listed species locations, refinement of the action area associated with flurprimidol regulatory decisions, and the biology of the potentially affected species would be needed before an effects determination can be made for any of the co-located species identified by this assessment for potential indirect effects.

Table VI-8. Listed Taxonomic Groups Potentially at Risk for Direct or Indirect Effects as a Result of Flurprimidol Applications (Applications are for Terrestrial and Residential Outdoor Uses where Turf Grass and Ornamentals are grown Nationwide)

Listed Taxon	Direct Effects	Use of Direct Effects Concern	Indirect Effects	Use of Indirect Effects Concern
Terrestrial and Semi- Aquatic Plants	Yes	All	Yes ^{3,4,5,6}	All
Beneficial Insects	No	None	Yes ^{3,4,5,6}	All
Birds, Reptiles, Terrestrial- phase Amphibians ¹	Yes	All	Yes ^{3,4,5,6}	Ali
Mammals	Yes	All	Yes ^{3,4,5}	All
Aquatic Vascular Plants	Yes	All	Yes ^{3,4,5}	Ali
Freshwater Fish and Aquatic-phase Amphibians ²	No	None	Yes ^{5,6}	All
Freshwater Crustaceans	No	None	Yes ^{5,6}	All
Freshwater Mollusks	No	Nопе	Yes ^{5,6}	All
Estuarine/marine Fish	No	None	No	None
Estuarine/marine Crustaceans	No	None	No	None
Estuarine/marine Mollusks	No	None	No	None
Aquatic Nonvascular Plants	No	None	Yes ^{3,4,5,6}	Ali

- Birds are used as surrogate species for terrestrial-phase amphibians and reptiles; therefore, potential direct and indirect effects to endangered avian, terrestrial-phase amphibians and reptilian species are considered equivalent.
- 2 Fish are used as a surrogate for aquatic phase amphibians; therefore, potential direct and indirect effects to endangered fish and aquatic-phase amphibian species are considered equivalent.
- 3 Potential indirect effects on a taxon attributable to direct effects on birds, terrestrial-phase amphibians and reptiles.
- 4 Potential indirect effects on a taxon attributable to direct effects on mammals.
- 5 Potential indirect effects on a taxon attributable to direct effects on terrestrial dicots and monocots.
- 6 Potential indirect effects on a taxon attributable to direct effects on alga and diatoms.

VII. Description of Assumptions, Limitations, Uncertainties, Strengths, and Data Gaps

Limitations of available methods of assessing risk and gaps in submitted data lead to uncertainty in risk conclusions. In assessing risk from flurprimidol use, major uncertainties arise from lack of tools to estimate exposure from limited residential use patterns in urban areas and outdoor use patterns in golf resorts, forestry, right-of-way, and industrial areas. Assumptions have therefore been made which are expected to lead to conservative estimates of risk.

A. Use Pattern

Flurprimidol is labeled for outdoor and residential uses only and application rates are expressed as pounds active ingredient per gallon. Quantifying risk, then, requires that assumptions be made about volume applied so that rates can be determined in terms of the amount of active ingredient applied per unit area, expressed as lbs a.i./A. This may not be representative of the small-scale residential and outdoor uses for which some flurprimidol products are intended. Additionally, the maximum number of applications allowed is not specified, and so an upper bound was estimated based on the length of the growing season and the minimum application interval. This led to an assumption of multiple applications per year, which is likely to be greater

than in typical use. For modeling purposes, it is assumed that flurprimidol is applied at this rate over the entire field considered by modeling applications. These assumptions about use and application are conservative and expected to lead to overestimation of risk.

B. Environmental Fate and Transport

The environmental fate database for parent flurprimidol is largely complete. The primary data gaps are in identifying degradates and characterizing their fate. Several major degradates have not been identified. Understanding of the fate properties of the major degradates is limited due to lack of fate studies for these compounds and deficiencies in studies of the parent compound.

C. Aquatic Exposure Estimates

Aquatic exposure estimates were developed using GENEEC2, a Tier I screening level model designed to estimate high level potential exposure in vulnerable environments. The model uses a chemical's label application information, its soil/water partition data and its degradation kinetics to estimate exposure values in a standard agricultural field / farm pond scenario. The program is generic in that it does not consider differences in climate, soils, topography or crop in estimating potential pesticide exposure. The standard pond scenario assumes that rainfall onto a treated, 10 hectare agricultural field causes pesticide-laden runoff into a one hectare; 20,000 cubic meter volume; 2.00 meter deep water-body. The farm pond represents a well mixed, static water body which has no flow through and so does not account for pesticide removal through flow through or water releases. The standard runoff scenario assumes uniform soils and agronomic management practices across the standard 10 hectare field.

This standard pond scenario is designed to represent agricultural uses and may not be representative of residential uses like those of flurprimidol. The model requires assumptions about the use pattern for flurprimidol, as described above, which are expected to lead to overestimates of exposure. The model also cannot account for some factors specific to residential uses such as banded or spot treatments. Default assumptions about spray drift are likely to be conservative for the hose-end and tank-type sprayers used for application of flurprimidol. Residential areas include both pervious and impervious surfaces; pesticides are usually applied to pervious surfaces with some reaching impervious surfaces through overspray. Tier I modeling does not account for the different runoff characteristics of these surfaces. The assumption that the entire 10-ha area is treated with flurprimidol is will outweigh any of these uncertainties.

Due to these uncertainties, estimates of risk to aquatic organisms are likely to be overprotective, but these estimates did not result in LOC exceedances for any risk categories for which there were toxicity data available.

D. Terrestrial Exposure Estimates

The TREX model was used to estimates potential exposure to terrestrial animals. The model assumes a default half-life of 35 days for residues on food items. Based on the rapid photolysis observed in flurprimidol fate studies, it is possible that this half-life is over conservative. The

model also assumes that birds and mammals are feeding exclusively within areas where flurprimidol is used. Given the small-scale nature of the use, it is unlikely that animals will obtain all dietary items within the treated area. Additionally, terrestrial exposure estimates rely on the same conservative assumptions about application rates as discussed above. Some underestimation of exposure is possible due to the fact that estimates are based primarily on dietary consumption of foliar residues and do not account for ingestion of residues by animals in drinking water or contaminated grit, ingestion through preening activities, or uptake through inhalation or dermal absorption by terrestrial animals. Along with the other conservative assumptions used, though, estimates of terrestrial exposure are still expected to be overprotective.

E. Ecological Effects

Species Selection and Sensitivity

There are a number of areas of uncertainty in the terrestrial and the aquatic animal risk assessments that could potentially cause an underestimation of risk. Use of toxicity data on representative species does not provide information on the potential variability in susceptibility to acute and chronic exposures. For baseline terrestrial risk assessments, a generic bird or mammal is assumed to occupy either the treated field or adjacent areas receiving the pesticide at a rate commensurate with the treatment rate on the field. The actual habitat requirements of any particular terrestrial species are not considered, and it is assumed that species occupy, exclusively and permanently, the treated area being modeled. This assumption leads to a maximum level of exposure in the risk assessment.

Although the baseline risk assessment relies on a selected toxicity endpoint from the most sensitive species tested, it does not necessarily mean that the selected toxicity endpoints reflect sensitivity of the most sensitive species existing in a given environment. The relative position of the most sensitive species tested in the distribution of all possible species is a function of the overall variability among species to a particular chemical. In the case of listed species, there is uncertainty regarding the relationship of the listed species' sensitivity and the most sensitive species tested.

Surrogates were used to predict potential risks for species with no data (i.e., reptiles and amphibians). It was assumed that the use of surrogate effects data is sufficiently conservative to apply to the broad range of species within taxonomic groups. If other species are more or less sensitive to flurprimidol than the surrogates, risks may be under- or overestimated, respectively. In addition, since terrestrial-phase amphibians and reptiles do not produce eggs in the same manner as birds, EFED is uncertain how the observed adverse effects in avian reproduction studies will affect reproduction in terrestrial-phase amphibians and reptiles.

Age class and sensitivity of effects thresholds

Scientists generally recognize that the age of the test animal may have a significant effect on the observed sensitivity to a toxicant. In a baseline assessment of acute toxicity in fish, data are collected on juveniles weighing 0.1 to 5 grams. For aquatic invertebrates, the recommended acute testing is performed on immature age classes (e.g., first instar for daphnids, second instar for amphipods, stoneflies and mayflies, and third instar for midges). Similarly, acute dietary

testing with birds is also performed on juveniles, with mallard ducks tested at 5-10 days of age and quail at 10-14 days of age.

Testing of juveniles may overestimate the toxicity of direct acting pesticides in adults. As juvenile animals do not have fully developed metabolic systems, they may not possess the ability to transform and detoxify xenobiotics equivalent to the older/adult animal. The baseline risk assessment has no current provisions for a generally applied method that accounts for this uncertainty. In so far as the available toxicity data may provide ranges of sensitivity information with respect to age class, the risk assessment uses the most sensitive life-stage information as the conservative baseline endpoint.

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APPENDIX A: GENEEC EECs

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ONE (MULT)	INTERVAL	SOIL SOLUB Kd (PPM)	(%DRIFT)	NO-SPRAY INCOR ZONE(FT) (IN)
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No. 1 FO	R 690-46	ON 0.6		NPUT VALUES *
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1444.00	•			173.60	.00	173.60
GENERIC EECs	(IN MICROGRA				2.0 Aug	
	MAX 4 DAY AVG GEEC	AV(G GEEC	MAX 60 DAY AVG GEEC	MAX 9	O DAY GEEC
	116.43					
RUN No. 8 E	OR 67690-19					
RATE (#/AC) ONE (MULT)	No.APPS & INTERVAL		SOLUBIL (PPM)		NO-SPRAY ZONE(FT)	
.000(3.000)		 -				
FIELD AND STA	ANDARD POND H	ALFLIFE	VALUES ((DAYS)	· .	
METABOLIC DA (FIELD) RA	AYS UNTIL HY AIN/RUNOFF	DROLYSI	PHOTO (PONI	DLYSIS MET D-EFF) (P	ABOLIC C	OMBINED (POND)
1444.00						
GENERIC EECs	(IN MICROGRA	MS/LITE	ER (PPB))	Version	2.0 Aug 1	1, 2001
GEEC	MAX 4 DAY AVG GEEC	AVG	GEEC	AVG GEEC	AVG (GEEC
	118.19					
RUN No. 14 F	OR 690-17		ON 1.5	by 3 5	* INPUT V	ALUES *
RATE (#/AC) ONE(MULT)	No.APPS & INTERVAL	SOIL Kd	SOLUBIL (PPM)	APPL TYPE (%DRIFT)	NO-SPRAY ZONE (FT)	INCORP
.500(2.960)	2 56	2.8	130.0	GRANUL (.	0) .0	. 0
FIELD AND STA		ALFLIFE				
METABOLIC DA						

(FIELD) ·	RAIN/RUNOFF	(POND))-EFF) ((POND)
1444.00	0	N/A				173.60
GENERIC EE	Cs (IN MICROGR	RAMS/LITER	(PPB))	Versio	on 2.0 Aug	1, 2001
GEEC	MAX 4 DAY AVG GEEC	AVG G	EEC	AVG GEEC	. AVG	GEEC
	116.63					
ONE (MULT)) No.APPS & INTERVAL	Kd (P	PM)			
	70) 4 14			GRHIFI(6	5.6) .0	.0
FIELD AND	STANDARD POND	HALFLIFE V	ALUES (DAYS)		
	DAYS UNTIL H RAIN/RUNOFF					
1444.00	0	N/A	1.40-	173.60	.00	173.60
GENERIC EE	Cs (IN MICROGR	AMS/LITER	(PPB))	Versio	n 2.0 Aug	1, 2001
	MAX 4 DAY AVG GEEC	AVG G	EEC		AVG	GEEC
126.97	126.39			115.96		.89

APPENDIX B. PRZM /EXAMS EEC and Output

stored as FLn1G.out Chemical: Flurprimidol

PRZM environment: FLnurserySTD_V2.txt modified Tueday, 27 May 2008 at 11:22:34

EXAMS environment: pond298.exv modified Tueday, 26 August 2008 at 06:14:08

Metfile: w12839.dvf modified Tueday, 26 August 2008 at 06:14:20

Water segment concentrations (ppb)

Year	Peak	96 hr	21 Day	60 Day	90 Day	Yearly		
1961	19.2	19.03	18.37	17.02	16.17	5.679		
1962	40.84	40.52	39.38	37.28	35.5	18.07		
1963	27.71	27.52	26.89	25.46	24.37	20.29		
1964	34.65	34.38	33.36	31.24	18.62	19.08		
1965	27.15	26.99	26.72	25.75	24.76	19.27		
1966	18.39	18.29	17.88	16.98	16.32	14.1		
1967	65.79	65.29	64.01	60.07	57,27	26.28		
1968	53.32	52.92	51.72	48.7	46.69	35.39		
1969	34.24	34,06	33.3	31.6	30.38	26.52		
1970	22.17	22.06	21.57	20.59	19.8	17.23		
1971	14.7	14.6	14.27	13.66	13.16	11.32		
1972	15.44	15.32	14.88	14	13.4	9.437		
1973	45.37	45.16	44.27	42.26	40.33	19.35		
1974	77.59	76.96	74.75	70.41	67.3	36.97		
1975	51.54	51.18	50.05	47.51	45.44	38.33		
1976	36.28	36.12	35.16	33.22	31.8	26.66		
1977	28.86	28.69	28.4	27.15	26.05	20.59		
1978	19.27	19.16	18.7	17.72	17.04	14.98		
1979	13.89	13.82	13.67	13.21	12.69	10.43		
1980	43.53	43.27	42.4	39,59	37.62	17.46		
1981	42,34	42.18	41.1	38.63	36.78	25.33		
1982	26.69	26.53	25.84	24.35	23.32	19.93		
1983	16.92	16.8	16.63	15.96	15.38	13.13		
1984	50.84	50.41	49.95	46.86	44.47	21.07		
1985	109	109	106	99.46	94.69	48.2		
1986	67.86	67.44	65.7	61.93	59.25	45.62		
1987	36.17	36.01	35.58	33.73	32.33	26.41		
1988	75.73	75.1	73.48	68.63	65.04	34.25		
	52.28	51.92	50.65	47.91	45.77	37.1		
1990	45.53	45.27	44.44	42.07	40.38	30.13		
Sorted re	esults							
Prob.	Peak	96 hr	21 Day	60 Day	90 Day	Yearly		
0.032258	306451612	29	109	109	106	99.46	94.69	48.2
0.064516	512903225	581	77.59	76.96	74.75	70.41	67.3	45.62
0.096774	119354838	371	75.73	75.1	73.48	68.63	65.04	38.33
0.129032	225806453	16	67.86	67.44	65.7	61.93	59.25	37.1
0.161290	032258064	15	65.79	65.29	64.01	60.07	57.27	36.97
	338709673		53.32	52.92	51.72	48.7	46.69	35.39
	545161290		52.28	51.92	50.65	47.91	45.77	34.25
	451612903		51.54	51.18	50.05	47.51	45.44	30.13
0.290323	258064516	51	50.84	50.41	49.95	46.86	44.47	26.66
	364516129		45.27	44.44	42.26	40.38	26.52	
	37096774		45.37	45.16	44.27	42.07	40.33	26.41
	677419354		43.53	43.27	42.4	39.59	37.62	26.28
	48387096		42.34	42.18	41.1	38.63	36.78	25.33
	290322580		40.84	40.52	39.38	37.28	35.5	21.07
	096774193		36.28	36.12	35.58	33.73	32.33	20.59
	903225800		36.17	36.01	35.16	33.22	31.8	20.29
	709677419		34.65	34.38	33.36	31.6	30.38	19.93
_	516129032		34.24	34.06	33.3	31.24	29.81	19.35
J.2 300 1.								

```
0.612903225806452
                            28.86
                                     28.69
                                              28.4
                                                       27.15
                                                               26.05
                                                                         19.27
                            27.71
0.645161290322581
                                     27.52
                                              26.89
                                                       25.75
                                                                24.76
                                                                         19.08
0.67741935483871 27.15
                            26.99
                                     26.72
                                              25.46
                                                       24.37
                                                                18.07
0.709677419354839
                            26.69
                                     26.53
                                              25.84
                                                       24.35
                                                               23.32
                                                                         17.46
0.741935483870968
                            22.17
                                     22.06
                                             21.57
                                                       20.59
                                                               19.8
                                                                         17.23
                            19.27
0.774193548387097
                                     19.16
                                              18.7
                                                       17.72
                                                               17.04
                                                                         14.98
                            19.2
0.806451612903226
                                     19.03
                                              18,37
                                                       17.02
                                                               16.32
                                                                         14.1
0.838709677419355
                            18.39
                                     18.29
                                              17.88
                                                       16.98
                                                                16.17
                                                                         13.13
0.870967741935484
                            16.92
                                     16.8
                                              16.63
                                                       15.96
                                                                15.38
                                                                         11.32
0.903225806451613
                            15.44
                                     15.32
                                              14.88
                                                       14
                                                               13.4
                                                                         10.43
0.935483870967742
                            14.7
                                     14.6
                                              14.27
                                                       13,66
                                                               13.16
                                                                        9.437
0.967741935483871
                           13,89
                                    13.82
                                             13.67
                                                       13.21
                                                               12.69
                                                                        5.679
0.1
         74.943 74.334
                           72.702
                                    67.96
                                             64.461
                                                      38,207
                                             Average of yearly averages: 23.6202
Inputs generated by pe5.pl - Novemeber 2006
Data used for this run:
Output File: FLn1G
Metfile: w12839.dvf
PRZM scenario:
                  FLnurserySTD_V2.txt
EXAMS environment file:
                          pond298.exv
Chemical Name:
                  Flurprimidol
Description
                  Variable Name
                                    Value
                                             Units
                                                      Comments
Molecular weight mwt
                           312.3
                                    g/mol
Henry's Law Const. henry
                           3.97e-09 atm-m^3/mol
Vapor Pressure
                  vapr
                           3.64e-07 torr
Solubilitysol
                  130
                           mg/L
Kd
         Kd
                  2.78
                           mg/L
Koc
         Koc
                           mg/L
Photolysis half-life kdp
                           1.4
                                             Half-life
                                    days
Aerobic Aquatic Metabolism kbacw
                                    0
                                             days
                                                      Halfife.
Anaerobic Aquatic Metabolism
                                    kbacs
                                             0
                                                      days
                                                               Halfife
Aerobic Soil Metabolism
                                    1444
                                             days
                                                      Halfife
Hydrolysis:
                  pH 7
                                    days
                                             Half-life
Method: CAM
                                    See PRZM manual
                           integer
Incorporation Depth:
                           DEPI
                                    U
                                             cm
Application Rate: TAPP
                           3.36
                                    kg/ha
Application Efficiency:
                           APPEFF 1.00
                                             fraction
Spray Drift
                  DRFT
                           0.00
                                    fraction of application rate applied to pond
                                    dd/mm or dd/mmm or dd-mm or dd-mmm
                           08-08
Application Date
                  Date
Record 17:
                  FILTRA
         IPSCND 1
         UPTKF
Record 18:
                  PLVKRT
         PLDKRT
         FEXTRC 0.5
Flag for Index Res. Run
                           IR
                                    EPA Pond
Flag for runoff calc.
                           RUNOFFnone
                                             none, monthly or total (average of entire run)
stored as MIn1G.out
Chemical: Flurprimidol
PRZM environment: MInurserySTD_V2.txt
                                             modified Sunday, 30 September 2007 at 23:05:00
EXAMS environment: pond298.exv modified Tueday, 26 August 2008 at 06:14:08
Metfile: w14840.dvf
                           modified Tueday, 26 August 2008 at 06:15:06
Water segment concentrations (ppb)
```

21 Day 90 Day Year Peak 96 hz 60 Day Yearly 1961 11.26 11.19 10.96 10.43 9.988 6.402 1962 10.69 10.68 10.47 10.09 9.801 7.558 1963 13.33 13.3 13.04 12.38 11.88 8.666

1964 1965	13.42 14.89	13.34 14.8	13.12 14.51	12.67 13.83	12.23 13.3	9.182 9.997		
1966	18.9	18.79	18.38	17.82	17.2	12.46		
1967	14.5	14.43	14.23	13.63	13.13	10.47		
1968	13.09	13.05	12.81	12.3	11.87	9.223		
1969	19.11	19.03	18.92	18.12	17.45	12.55		
1970	11.4	11.37	11.27	11.02	10.86	9.149		
1971	15.4	15.31	14.92	14.13	13.62	10.21		
1972	18.31	18.28	18.08	17.52	16.94	12.66		
1973	11.47	11.43	11.35	11.1	11.02	9.441		
1974	14.27	14.19	13.88	13.5	13.08	9.9		
1975	14.56	14.55	14.4	13.77	13.26	10.12		
1976	28.89	28.74	28.13	26.73	25.62	17.63		
1977	31.08	30.93	30.4	28.85	27.63	20.52		
1978	34.9	34.77	34.44	33.5	32.37	23.96		
1979	26.98	26.85	26.55	25.45	24.62	19.69		
1980	16.92	16.85	16.63	16.16	15.86	13.33		
1981	16.99	16.94	16.65	15.85	15.25	11.82		
1982	26.64	26.59	26.27	25.52	24.65	17.72		
1983	29.22	29.05	28.85	28.01	27.26	20.31		
1984	25.47	25.45	25.36	24.63	23.85	18.54		
1985	20.34	20.23	19.88	19.3	18.67	14.83		
1986	21.66	21.53	21.04	20.32	19.67	14.93		
1987	22	21,86	21.38	20.43	19.79	15.4		
1988	19.04	18.92	18.68	18.07	17.37	13.67		
1989	15.79	15.71	15.58	15.32	14.97	11.95		
1990	27.57	27.38	26.93	25.95	25.03	17.88		
Sorted r	esults							
Prob.	Peak	96 hr	21 Day	60 Day	90 Day	Yearly		
0.03225	80645161	29 -	34.9	34.77	34.44	33.5	32.37	23.96
0.06451	61290322	581	31.08 1	30.93	30.4	28.85	27.63	20.52
	41935483		29.22	29.05	28.85	28.01	27.26	20.31
0.12903	22580645	16	28.89	28.74	28.13	26.73	25.62	19.69
0.16129	03225806	45	27.57	27.38	26.93	25.95	25.03	18.54
0.19354	83870967	74	26.98	26.85	26.55	25.52	24.65	17.88
0.22580	64516129	03	26.64	26.59	26.27	25.45	24.62	17.72
0.25806	45161290	32	25.47	25.45	25.36	24.63	23.85	17.63
0.29032	25806451	61	22	21.86	21.38	20.43	19.79	15.4
0.32258	06451612	9 21.66	21.53	21.04	,20.32	19.67	14.93	
0.35483	87096774	19	20.34	20.23	19.88	19.3	18.67	14.83
0.38709	67741935	48	19.11	19.03	18.92	18.12	17.45	13.67
0.41935	48387096	77	19.04	18.92	18.68	18.07	17.37	13.33
0.45161	29032258	06	18.9	18.79	18.38	17.82	17.2	12.66
0.48387	09677419	36	18.31	18.28	18.08	17.52	16.94	12.55
0.51612	90322580	65	16.99	16.94	16.65	16.16	15.86	12.46
0.54838	70967741	94	16.92	16.85	16.63	15.85	15.25	11.95
0.58064	51612903	23	15.79	15:71	15.58	15.32	14.97	11.82
0.61290	32258064	52	15.4	15.31	14.92	14.13	13.62	10.47
0.64516	12903225	81	14.89	I4.8	14.51	13.83	13.3	10.21
0.67741	93548387	1 14.56	14.55	14.4	13.77	13.26	10.12	
0.70967	74193548	39	14.5	14.43	14.23	13.63	13.13	9.997
0.74193	54838709	68	14.27	14.19	13.88	13.5	13.08	9.9
0.77419	35483870	97	13.42	13.34	13.12	12.67	12.23	9.441
0.80645	16129032	26	13.33	13.3	13,04	12.38	11.88	9.223
0.83870	96774193	55	13.09	13.05	12.81	12.3	11.87	9.182
	77419354		11.47	11.43	11.35	11.1	11.02	9.149
0.90322	58064516	13	11.4	11.37	11.27	11.02	10.86	8.666
0.93548	38709677	42	11.26	11.19	10.96	10.43	9.988	7.558
0.96774	119354838	71	10.69	10.68	10.47	10.09	9.801	6.402
0.1	20 107	29.019	10 770	27.882	27.096	20.248		
0.1	29.187	29.019	28.778	41.002	27.090			
						74		

Inputs generated by pe5.pl - Novemeber 2006

1970

1971

1972

1973

1974

1975

1976

1977

1978

17.61

26.16

26.76

21.29

24.27

23.58

27.12

43.59

28

17.51

26

26.6

21.19

24.14

23.49

26.96

27,84

43,39

17.38

25.84

26.31

20.81

23.92

23.25

26.44

27.57

42.35

16.91

24.76

25.29

20.11

23.14

22.38

25.18

26.51

40.16

16.42

23.79

24.52

19,49

22.32

21.67

24.31

25,63

38,65

Data used for this run: Output File: MIn1G Metfile: w14840.dvf PRZM scenario: MInurserySTD V2.txt EXAMS environment file: pond298.exv Chemical Name: Flurprimidol Description Variable Name Value Units Comments 312.3 Molecular weight mwt g/mol 3.97e-09 atm-m^3/mol Henry's Law Const.henry Vapor Pressure 3.64c-07 torr vapr -Solubilitysol 130 mg/L Kd Κd 2.78 mg/L Koc Koc mg/L Photolysis half-life kdp 1.4 Half-life days Aerobic Aquatic Metabolism kbacw 0 Halfife days Anaerobic Aquatic Metabolism 0 kbacs days Halfife Aerobic Soil Metabolism asm 1444 days Halfife Hydrolysis: Half-life pH 7 days Method: CAM integer See PRZM manual Incorporation Depth: DEPI 0 cm kg/ha Application Rate: TAPP 3.36 Application Efficiency: APPEFF 1.00 fraction Spray Drift DRFT 0.00 fraction of application rate applied to pond 08-03 Application Date Date dd/mm or dd/mmm or dd-mm or dd-mmm Record 17: **FILTRA** IPSCND 1 UPTKF Record 18: PLVKRT PLDKRT FEXTRC 0.5 Flag for Index Res. Run IR EPA Pond ... Flag for runoff calc. RUNOFFnone none, monthly or total(average of entire run) stored as MIn2G.out Chemical: Flurprimidol PRZM environment; MInurserySTD_V2.txt modified Sunday, 30 September 2007 at 23:05:00 EXAMS environment: pond298.exv modified Tueday, 26 August 2008 at 06:14:08 Metfile: w14840.dvf modified Tueday, 26 August 2008 at 06:15:06 Water segment concentrations (ppb) 60 Day 90 Day Yearly Year 96 hr 21 Day Peak 1961 13.88 13.78 13.54 12.92 12.45 7.507 1962 14.96 14.41 13.92 11.01 15.23 15.13 1963 15.92 15.35 14.87 12.02 16.21 16.12 1964 16.44 15.33 12.31 16.72 16.61 15.84 1965 25.95 24.97 24.03 17.24 26,44 26.31 1966 22.83 22.7 22.52 21.89 21.24 17.87 1967 19.25 19.13 18.46 17.88 15.27 19.32 1968 18.2 18.1 17.78 17.22 16.66 13,89 1969 20.56 20.47 20.25 19.61 19.06 15.42

> 28.96 75

13.82

17.55

20.05

17.07

17.54

17.9

19.97

21.38

1979 1980 1981 1982 1983 1984 1985 1986 1987 1988 1989	52.83 35.17 32.15 40.48 33.11 31.94 26.88 25.51 27.87 24.25 25.55 41.5	52.54 35.07 32.03 40.29 32.95 31.76 26.72 25.39 27.76 24.13 25.4 41.27	51.35 34.64 31.59 39.75 32.49 31.27 26.44 25.09 27.31 23.94 24.83 40.93	48.74 33.73 30.65 37.94 31.15 29.84 25.41 24.37 26.08 23 23.89 39.17	46.73 32.88 29.68 36.53 30.61 28.87 24.59 23.66 25.16 22.26 23.15 37.73	35.06 29.53 24.9 28.71 25.85 23.81 21.09 19.95 20.2 18.45 18.58 27.38		
Sorted r	esults							•
Prob.	Peak	96 hr	21 Day	60 Day	90 Day	Yearly		
	80645161		52.83	52.54	51.35	48.74	46.73	35.06
	61290322		43.59	43.39	42.35	40.16	38.65	29.53
	41935483		41.5	41.27	40.93	39.17	37.73	28.96
	22580645		40.48	40.29	39.75	37.94	36.53	28.71
	03225806		35.17	35.07	34.64	33.73	32.88	27.38
0.19354	83870967	74	33.11	32,95	32.49	31.15	30.61	25.85
0.22580	64516129	03	32,15	32.03	31.59	30.65	29.68	24.9
0.25806	45161290	32	31.94	31.76	31.27	29.84	28.87	23.81
0.29032	25806451	61	28	27.84	27.57	26.51	25.63	21.38
0.32258	06451612	9 27.87	27.76	27.31	26.08	25.16	21.09	
0.35483	87096774	19	27.12	26.96	26.44	25.41	24.59	20.2
0.38709	67741935	48	26.88	26,72	26.44	25.29	24.52	20.05
	48387096		26.76	26.6	26.31	25.18	24.31	19.97
	29032258		26.44	26.31	25.95	24.97	24.03	19.95
	09677419		26.16	26	25.84	24.76	23.79	18.58
	90322580		25.55	25,4	25.09	24.37	23.66	18.45
	70967741		25.51	25.39	24.83	23.89	23.15	17.9°
	51612903		24.27	24.14	23.94	23.14	22.32	17.87
-	32258064		24.25	24.13	23.92	23	22.26	17.55
	12903225		23.58	23.49	23.25	22.38	21.67	17.54
	93548387		22.7	22.52	21.89	21.24	17.24	
	74193548:		21.29	21.19	20.81	20.11	19.49	17.07
	54838709		20.56	20.47	20.25	19.61	19.06	15.42
	35483870		19.32	19.25	19.13	18.46	17.88	15.27
	16129032	-	18.2	18.1	17.78	17.22	16.66	13.89
	96774193.		17.61	17.51	17.38	16.91	16.42	13.82
	77419354		16,72	16.61	16.44	15.84	15.33	12.31
	58064516		16.21	16.12	15.92	15.35	14.87	12.02
	38709677		15.23	15.13	14.96	14.41	13.92	11,01
0.96774	19354838	/1	13.88	13.78	13.54	12.92	12.45	7.507
0.1	41.398	41.172	40,812	39.047	37.61 Average	28.935 of yearly	averages:	19.6762333333333

Inputs generated by pc5.pl - Novemeber 2006

Data used for this run: Output File: MIn2G Metfile: w14840.dvf

PRZM.scenario: MInurserySTD_V2.txt EXAMS environment file: pond298.exv Chemical Name: Flurprimidol

Variable Name Value Units Comments Description

312.3 g/moi 3.97e-09 atm-m^3/mol Molecular weight inwt Henry's Law Const. henry

Vapor Pressure vapr 3,64e-07 torr

Solubilitysol 130 mg/L

```
Κd
         Kd
                  2.78
                            mg/L
Koc
         Koc
                            mg/L
                                               Half-life
Photolysis half-life kdp
                            1.4
                                     days
Aerobic Aquatic Metabolism kbacw
                                     0
                                               days
                                                        Halfife
Anaerobic Aquatic Metabolism
                                               O
                                     kbacs
                                                        days
                                                                 Halfife
Aerobic Soil Metabolism
                                      1444
                                               days
                                                        Halfife
                            asm
Hydrolysis:
                   pH 7
                                     days
                                               Half-life
Method: CAM
                                     See PRZM manual
                            integer
                            DEPI
Incorporation Depth:
                                     0
                                              cm
Application Rate: TAPP
                            1.68
                                     kg/ha
Application Efficiency:
                            APPEFF 1.00
                                              fraction
Spray Drift
                   DRFT
                            0.00
                                     fraction of application rate applied to pond
Application Date
                            08-03
                                     dd/mm or dd/mmm or dd-mm or dd-mmm
                  Date
Interval 1 interval
                            days
                                     Set to 0 or delete line for single app.
app. rate 1
                            1.68
                  apprate
                                     kg/ha
Record 17:
                  FILTRA
         IPSCND 1
         UPTKF
Record 18:
                  PLVKRT
         PLDKRT
         FEXTRC 0.5
                            IR
Flag for Index Res. Run
                                     EPA Pond
                            RUNOFFnone
Flag for runoff calc.
                                              none, monthly or total (average of entire run)
stored as NJn4GS37.out
Chemical: Flurprimidol
PRZM environment: NJnurserySTD_V2.txt
                                              modified Sunday, 30 September 2007 at 23:05:00
                                     modified Tueday, 26 August 2008 at 06:14:08
EXAMS environment; pond298.exv
                            modified Tueday, 26 August 2008 at 06:16:14
Metfile: w93730.dvf
Water segment concentrations (ppb)
                            21 Day
                                     60 Day
                                              90 Day
                                                        Yearly
Year
         Peak
                  96 hr
1961
         17.03
                  16.93
                            16.63
                                     16.28
                                              15.91
                                                        10.95
1962
         24.4
                  24.26
                            24.08
                                     23.39
                                              22.68
                                                        17.24
1963
         26.97
                            26.32
                                     25.47
                                              24.73
                                                        19.32
                  26,8
                                                        23
1964
                                              30.72
         32.61
                            31.87
                                     31.55
                  32.39
1965
         22
                            21.65
                                     21.02
                                              20.37
                                                        17.62
                  21.87
1966
         19.02
                  18.95
                            18.65
                                     18.22
                                              17.62
                                                        14.24
1967
                                              29.99
         31.94
                  31.72
                            31.49
                                     30.72
                                                        21.52
1968
         38.72
                            37.6
                                     36.24
                                              35,2
                                                        27.42
                  38.5
1969
         30.38
                  30.19
                            29.97
                                     29.2
                                              28.28
                                                        23,27
1970
         24.66
                  24.54
                            24.13
                                     23.3
                                              23.22
                                                        19.33
1971
         22,79
                  22.67
                            22.4
                                     21.81
                                              21.12
                                                        16.96
1972
         22,31
                  22.18
                            21.77
                                     21.21
                                              20.94
                                                        16.95
1973
         22.62
                  22.49
                            22,09
                                     21.78
                                              21.51
                                                        16.7
1974
         28.26
                  28.I
                            27.74
                                     26.92
                                              26.07
                                                        19.84
1975
         41.02
                  40.76
                            40.03
                                     38.5
                                              37.08
                                                        26.56
                                              31.03
1976
         33.75
                  33.55
                            33.23
                                     32.01
                                                        25.13
                                              30.25
1977
         32.56
                  32.36
                            32.1
                                     31.08
                                                        24.67
                                              34.76
1978
         39.15
                            38.05
                                     36.03
                                                        26.96
                  38.93
1979
         24,1
                  23.97
                            23.49
                                     22.77
                                              22.1
                                                        19.42
1980
         25.76
                            25.25
                                     24,95
                                              24.63
                                                        19.28
                  25.63
                                     29.83
                            30.71
                                              28.96
                                                        22,11
1981
         31.55
                  31.35
1982
                            22.18
                                     21.55
                                              20.94
                                                        18.01
         22.61
                  22.48
1983
         30.76
                  30.57
                            29.84
                                     28.44
                                              27.87
                                                        20.47
                                                        29.1
1984
         41.68
                  41.45
                            40.36
                                     38.16
                                              37.26
                                                        25.36
1985
         33.27
                  33.08
                            32.69
                                     31.79
                                              31
                                              41,83
                                                        30.38
1986
         44.22
                  43.92
                           43.55
                                     42.57
         36.99
                                     35.99
                                              35.58
                                                        28.71
1987
                  36.78
                            36.38
1988
         27.35
                  27.22
                            26.87
                                     26.45
                                              25.93
                                                        21.62
[989
         32.58
                  32.38
                            31.59
                                     30.45
                                              29.4
                                                        21.57
1990
         30.08
                  29.9
                            29.25
                                     27.86
                                              26.81
                                                        21.19
```

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Sorted re	esults							
Prob.	Peak	96 hr	21 Day	60 Day	90 Day	Yearly		
0.03225	80645161	29	44.22	43.92	43.55	42.57	41.83	30.38
0.06451	61290322	581	41.68	41.45	40.36	38.5	37.26	29.1
0.09677	41935483	871	41.02	40.76	40.03	38.16	37.08	28.71
0.12903	22580645	16	39.15	38.93	38.05	36.24	35.58	27.42
0.16129	03225806	45	38.72	38.5	37.6	36.03	35.2	26.96
0.19354	83870967	74	36.99	36.78	36.38	35.99	34.76	26.56
0.22580	64516129	03	33.75	33.55	33.23	32.01	31.03	25.36
0.25806	45161290	32	33.27	33.08	32.69	31.79	31	25.13
0.29032	25806451	61	32.61	32.39	32.1	31.55	30.72	24.67
0.32258	06451612	9 32.58	32.38	31.87	31.08	30.25	23.27	
0.35483	87096774	19	32.56	32.36	31.59	30.72	29.99	23
0.38709	67741935	48	31.94	31.72	31.49	30.45	29.4	22.11
0.41935	48387096	77	31.55	31.35	30.71	29.83	28.96	21.62
0.451613	29032258	06	30.76	30.57	29.97	29.2	28.28	21.57
0.483876	09677419:	36	30.38	30.19	29.84	28.44	27.87	21.52
0.516129	90322580	65	30.08	29.9	29.25	27.86	26.81	21.19
0.54838	70967741	94	28.26	28.1	27.74	26.92	26.07	20.47
0.58064	51612903:	23	27.35	27.22	26.87	26.45	25.93	19.84
0.61290	32258064	52	26.97	26.8	26.32	25.47	24.73	19.42
0.64516	12903225	81	25.76	25.63	25.25	24.95	24.63	19.33
0.677419	93548387	1 24.66	24.54	24.13	23.39	23.22	19.32	
	74193548:		24.4	24.26	24.08	23.3	22.68	19.28
	54838709		24.1	23.97	23.49	22.77	22.1	18.01
	35483870		22.79	22.67	22.4	21.81	21.51	17.62
	16129032		22.62	22.49	22.18	21.78	21.12	17.24
	96774193:		22.61	22.48	22.09	21.55	20.94	16.96
	77419354		22.31	22.18	21.77	21.21	20.94	16.95
	58064516		22	21.87	21.65	21.02	20.37	16.7
	38709677 _°		19.02	18.95	18.65	18.22	17,62	14.24.
0.96774	19354838	71	17.03	16.93	16.63	16.28	15.91	10.95
1.0	40.833	40.577	39.832	37.968	36.93	28.581		

Inputs generated by pe5.pl - November 2006

Data used for this run: Output File: NJn4GS37 Metfile: w93730.dvf

PRZM scenario: NJnurserySTD_V2.tx1 EXAMS environment file: pond298.exv

Chemical Name: Flurprimidol Description Variable Nam

Description Variable Name Value Units Comments

Molecular weight mwt 312.3 g/mol Henry's Law Const.henry 3.97e-09 atm-m^3/mol

Vapor Pressure vapr 3.64e-07 torr Solubilitysol 130 mg/L

Kd Kd 2.78 mg/L Koc Koc mg/L

Photolysis half-life kdp I.4 days Half-life

Aerobic Aquatic Metabolism kbacw 0 days Halfife

Anaerobic Aquatic Metabolism kbacs 0 days Halfife

Aerobic Soil Metabolism asm 1444 days Halfife Hydrolysis: pH 7 0 days Half-life

Method: CAM 2 integer See PRZM manual Incorporation Depth: DEPI 0 cm

Application Rate: TAPP 0.84 kg/ha
Application Efficiency: APPEFF 0.99

Spray Drift DRFT 0.01 fraction of application rate applied to pond

fraction

Average of yearly averages: 21.4966666666667

```
Application Date
                   Date
                             7-3
                                      dd/mm or dd/mmm or dd-mmm
Interval 1 interval
                   21
                             days
                                      Set to 0 or delete line for single app.
app. rate 1
                   apprate
                            0.84
                   21
Interval 2 interval
                             days
                                      Set to 0 or delete line for single app.
app. rate 2
                            0.84
                   apprate
                   21
Interval 3 interval
                             days
                                      Set to 0 or delete line for single app.
app. rate 3
                   apprate
                            0.84
                                      kg/ha
                   FILTRA
Record 17:
          IPSCND 1
          UPTKF
                   PLVKRT
Record 18:
          PLDKRT
          FEXTRC 0.5
Flag for Index Res. Run
                             IR
                                      EPA Pond
Flag for runoff calc.
                             RUNOFFnone
                                               none, monthly or total (average of entire run)
stored as PAturf4GS.out
Chemical: Flurprimidol
PRZM environment: PAturfSTD,txt
                                      modified Thuday, 23 February 2006 at 18:55:08
EXAMS environment; pond298.exv
                                      modified Tueday, 26 August 2008 at 06:14:08
Metfile: w14751.dvf
                            modified Tueday, 26 August 2008 at 06:15:00
Water segment concentrations (ppb)
                   96 hr
                                               90 Day
·Year
          Peak
                            21 Day
                                      60 Day
                                                        Yearly
1961
         6.052
                   6.004
                                               5.353
                                                        2.102
                            5.843
                                      5.588
1962
                   6.853
                            6.679
         6.896
                                      6.328
                                               6.164
                                                        4.79
1963
         6.129
                   6.091
                            5.919
                                      5.842
                                               5.769
                                                        5.26
1964
         6.671
                   6.627
                            6.453
                                               5.908
                                                        5.093
                                      6.152
1965
         5.405
                   5.375
                            5.253
                                      5.129
                                               5.028
                                                        4.546
1966
         28.73
                   28.52
                                               24.69
                                                        9.883
                            27.66
                                      25.84
1967
         21.88
                   21.76
                            21.28
                                               20.19
                                      20.6
                                                        17.04
1968
         21.81
                   21.65
                            20.99
                                      19.79
                                               19.09
                                                         13.8
1969
         24.66
                   24.52
                            23.87
                                      22.83
                                               22.01
                                                         17.14
1970
         17.96
                   17.96
                            17.95
                                      17.94
                                               17.74
                                                        15
1971
         15,38
                   15.28
                            15.13
                                               14.01
                                      14.51
                                                        11.29
1972
         11.51
                                               10.76
                  11.46
                            11.24
                                      10.93
                                                        9.09
1973
         30.9
                   30.67
                            29.75
                                      27.88
                                               26.68
                                                        12.05
1974
         22.33
                   22.23
                            21.81
                                     20.88
                                               20.18
                                                        17.33
1975
         14.51
                   14.45
                            14.2
                                      13.64
                                               13.23
                                                        10.8
1976
                                               8.178
         9.176
                   9.122
                            8.899
                                     8.46
                                                        7.286
1977
         7,495
                   7.495
                            7.495
                                     7.493
                                               7.387
                                                        6.229
1978
         5,326
                  -5.325
                            5.323
                                     5.318
                                               5.254
                                                        4.586
1979
         7.216
                   7.168
                            6.997
                                     6.642
                                               6.392
                                                        4.298
1980
         7.109
                   7.064
                            6.888
                                      6.611
                                               6.023
                                                        4.937
1981
         7.141
                   7.103
                            6.949
                                      6.893
                                               6.751
                                                        5.852
1982
         5.484
                   5.483
                            5.48
                                     5.471
                                               5.41
                                                        4.721
1983
                                               3.521
         3.878
                   3.862
                            3.792
                                     3.636
                                                        3.188
1984
                   3.611
                                     3.391
                                               3.309
                                                        2.848
         3.633
                            3.522
1985
                            4.924
                                               4.542
         5.087
                   5.052
                                     4.673
                                                        3.086
1986
                  7.149
                            6.981
                                               6.738
                                                        4.864
         7.192
                                     6.925
                  7.564
                                               6.803
1987
         7.61
                            7.454
                                     7.08
                                                        5.342
1988
                   5.86
                                               5.637
                                                        5.161
         5,893
                            5.726
                                     5.71
1989
         14.24
                   14.14
                            13.82
                                     13.32
                                               12.83
                                                        7.124
1990
         10.95
                   10.9
                            10.69
                                     10.22
                                               9.888
                                                        8.597
Sorted results
                                               90 Day
         Peak
                   96 hr
                            21 Day
                                     60 Day
                                                        Yearly
Prob.
0.032258064516129
                            30.9
                                     30.67
                                               29.75
                                                        27.88
                                                                 26.68
                                                                           17.33
                            28.73
                                               27.66
                                                        25.84
                                                                 24.69
0.0645161290322581
                                     28.52
                                                                           17.14
0.0967741935483871
                            24.66
                                     24.52
                                               23.87
                                                        22.83
                                                                 22.01
                                                                           17.04
0.129032258064516
                            22.33
                                     22.23
                                              21.81
                                                        20.88
                                                                 20.19
                                                                           15
0.161290322580645
                            21.88
                                     21.76
                                              21.28
                                                        20.6
                                                                 20.18
                                                                           13.8
                                               20.99
                                                        19.79
0.193548387096774
                            21.81
                                     21.65
                                                                 19.09
                                                                           12.05
```

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```
0.225806451612903
                            17.96
                                     17.96
                                              17.95
                                                       17.94
                                                                17.74
                                                                          11.29
0.258064516129032
                            15.38
                                     15.28
                                              15.13
                                                       14.51
                                                                14.01
                                                                          10.8
0.290322580645161
                            14.51
                                     14.45
                                              14.2
                                                       13.64
                                                                         9.883
                                                                13.23
0.32258064516129 14.24
                            14.14
                                     13.82
                                              13.32
                                                       12.83
                                                                9.09
0.354838709677419
                            11.51
                                     11.46
                                              11.24
                                                       10,93
                                                                10.76
                                                                         8.597
0.387096774193548
                            10.95
                                              10.69
                                     10.9
                                                       10.22
                                                                9.888
                                                                          7.286
0.419354838709677
                            9.176
                                     9.122
                                              8.899
                                                       8.46
                                                                8.178
                                                                         7.124
0.451612903225806
                            7.61
                                     7.564
                                              7.495
                                                       7.493
                                                                         6.229
                                                                7.387
0.483870967741936
                            7.495
                                     7.495
                                              7.454
                                                       7.08
                                                                6.803
                                                                         5.852
0.516129032258065
                            7.216
                                     7.168
                                              6.997
                                                       6.925
                                                                6.751
                                                                         5.342
0.548387096774194
                            7.192
                                     7.149
                                              6.981
                                                       6.893
                                                                6.738
                                                                         5.26
0.580645161290323
                            7.141
                                     7.103
                                              6.949
                                                       6.642
                                                                6.392
                                                                         5.161
                            7.109
0.612903225806452
                                     7.064
                                              6.888
                                                       6.611
                                                                6.164
                                                                         5.093
                            6.896
0.645161290322581
                                     6.853
                                              6.679
                                                       6.328
                                                                6.023
                                                                         4.937
0.67741935483871 6.671
                            6.627
                                     6.453
                                              6.152
                                                       5.908
                                                                4.864
0.709677419354839
                           6.129
                                     6.091
                                              5.919
                                                       5.842
                                                                5.769
                                                                         4.79
0.741935483870968
                           6.052
                                     6.004
                                              5.843
                                                       5.71
                                                                5.637
                                                                         4.721
0.774193548387097
                           5.893
                                              5.726
                                                       5.588
                                                                         4.586
                                     5.86
                                                                5.41
0.806451612903226
                            5.484
                                              5.48
                                                                         4.546
                                     5.483
                                                       5.471
                                                                5.353
0.838709677419355
                           5.405
                                     5.375
                                              5.323
                                                       5.318
                                                                5.254
                                                                         4.298
0.870967741935484
                           5.326
                                              5.253
                                     5.325
                                                       5.129
                                                                5.028
                                                                         3.188
0.903225806451613
                           5.087
                                     5.052
                                              4.924
                                                                4.542
                                                                         3.086
                                                       4.673
0.935483870967742
                           3.878
                                    3.862
                                              3.792
                                                       3.636
                                                                3.521
                                                                         2.848
0.967741935483871
                           3.633
                                              3.522
                                    3.611
                                                       3.391
                                                                3.309
                                                                         2.102
1.0
         24.427
                  24.291
                           23.664
                                    22.635
                                             21.828
                                                       16.836
```

Inputs generated by pe5.pl - November 2006

Data used for this run: Output File: PAturf4GS Metfile: w14751.dvf

PRZM scenario: PAturfSTD.txt EXAMS environment file; pond298.exv

Chemical Name: Flurprimidol

Description Variable Name Value Units Comments

Molecular weight mwt 312.3 g/mol Henry's Law Const. henry 3.97e-09 atm-m^3/mol

Vapor Pressure vapr 3.64e-07 torr Solubilitysol 130 mg/L Κd Kd 2.78 mg/L Koc Koc mg/L

Photolysis half-life kdp Half-life 1.4 days

Aerobic Aquatic Metabolism kbacw days Halfife

Anaerobic Aquatic Metabolism 0 kbacs days Halfife 1444 days Aerobic Soil Metabolism Halfife

Half-life Hydro!ysis: pH 7 days Method: CAM integer See PRZM manual Incorporation Depth: DEPI a cm

asm

Application Rate: TAPP 0.84 kg/ha

Application Efficiency: APPEFF 0.99 fraction

fraction of application rate applied to pond Spray Drift DRFT 0.01 Application Date Date 5-7 dd/mm or dd/mmm or dd-mmm Set to 0 or delete line for single app. Interval 1 interval 21 days

0.84 app. rate 1 apprate

Interval 2 interval 21 days Set to 0 or delete line for single app.

app. rate 2 0.84 apprate

Interval 3 interval 21 days Set to 0 or delete line for single app.

0.84 app. rate 3 apprate kg/ha

Record 17: FILTRA

IPSCND 1

Average of yearly averages: 7.777766666666667

UPTKF

Record 18: PLVKRT

PLDKRT FEXTRC 0.5

Flag for Index Res. Run IR

Flag for runoff calc. RUNOFFnone none, monthly or total (average of entire run)

EPA Pond

stored as NJn4GS52.out Chemical: Flurprimidol

PRZM environment: NJnurserySTD_V2.txt modified Sunday, 30 September 2007 at 23:05:00 EXAMS environment: pond298.exv modified Tueday, 26 August 2008 at 06:14:08

modified Tueday, 26 August 2008 at 06:16:14 Metfile: w93730.dvf

Water segment concentrations (ppb)

Year	Peak	96 hr 🤇	21 Day	60 Day	90 Day	Yearly			
1961	14.28	14.18	13.9	13.3	12.76	6.039			
1962	21.36	21.23	20.88	20.28	19.66	13.6			
1963	36.08	35.84	35,24	33.71	32.84	23.16			
1964	32.84	32.66	32.49	31.62	31.02	24.95			
1965	31.11	30.98	30.59	29.61	28.85	23,45			
1966	31.6	31.41	30.72	30.32	29.83	23.91			1000
1967	49.36	49.06	47.95	45.45	43.52	28.98			
1968	42.55	42.3	41.56	40.3	39.31	33.8			
1969	59.1	58.75	57.72	54.76	52.54	36.18			
1970	41.73	41.52	41.04	40.7	40.18	35.68			
1971	47.01	46.7	45.59	44	42.56	32.5			
1972	35.31	35.11	34.87	33.93	33.08	29.16			
1973	28.84	28.68	28.3	27.23	26.37	22.77			
1974	29.86	29.69	28.99	27.64	26.82	21.03			
1975	39.75	39.53	38.77	36.98	35.79	25.58			
1976	35.41	35.18	34.68	33.27	32.41	27.32	_		
1977	33.79	33.6	33	31.95	31.31	26.28			
1978	68.43	67.96	66.6	65.48	63.37	41.09			
1979	69.99	69.57	68.03	64.79	62.33	46.91			
1980	47.07	46.79	46.48	46.02	45.52	41.56			
1981	43.71	43.46	42.87	41.36	40.31	34.26			
1982	34.11	33.91	33.54	32.67	31.93	28.08			
1983	28.99	28.81	28.62	27.61	26.73	22.41			
1984	30.19	30.03	29.74	28.83	28.17	22.28			
1985	32.91	32.7	32.3	31	29.95	23.4			
1986	27.51	27.35	27.01	26.61	26.08	21.53			
	47.9	47.59	46.79	45.46	44.49	29.44			
1988	41.6	41.34	40.78	39.07	37.62	31.06			
1989	35.4	35.27	34.47	32.74	31.77	26.15			
1990	39.21	38.98	38.54	37.16	35.89	28.14			
1550	57.21	00.50	50.5	• /					
Sorted re	esults								
Prob.	Peak	96 hr	21 Day	60 Day	90 Day	Yearly		•	
	306451612		69.99	69.57	68,03	65.48	63.37	46.91	
-	1290322		68.43	67.96	66.6	64.79	62.33	41.56	
	119354838		59.1	58.75	57.72	54.76	52.54	41.09	
	22580645		49.36	49.06	47.95	46.02	45.52	36.18	
-)32258064		47.9	47.59	46.79	45.46	44.49	35.68	
	33870967°		47.07	46.79	46.48	45.45	43.52	34.26	
	545161290		47.01	46.7	45,59	44	42.56	33.8	
			43.71	43.46	42.87	41.36	40.31	32.5	
	15161290: 258064510		42.55	42.3	41.56	40.7	40.18	31.06	
			41.52	41.04	40.3	39.31	29.44	31.00	
	064516129				40.78	39.07	37.62	29.16	
	37096774°		41.6 39.75	41.34 39.53	38.77	37.16	35.89	28.98	
	577419354					36.98	35.79	28.14	
	183870961 100222580		39.21	38.98	38.54				
	290322580		36.08	35.84	35.24	33.93	33.08	28.08 27.32	
0.483870	096774193	50	35.41	35.27	34.87	33.71	32.84	21.32	
						611			

```
0.516129032258065
                            35.4
                                     35.18
                                              34.68
                                                       33.27
                                                                32.41
                                                                          26.28
0.548387096774194
                            35.31
                                     35.11
                                              34.47
                                                       32.74
                                                                31.93
                                                                          26.15
0.580645161290323
                                                                31.77
                            34.11
                                              33,54
                                                       32.67
                                     33.91
                                                                          25.58
0.612903225806452
                            33.79
                                     33.6
                                              33
                                                       31.95
                                                                31.31
                                                                          24.95
0.645161290322581
                            32.91
                                     32.7
                                              32.49
                                                       31.62
                                                                31.02
                                                                          23.91
                            32.66
0.67741935483871 32.84
                                     32.3
                                              31
                                                       29.95
                                                                23.45
0.709677419354839
                            31.6
                                     31.41
                                              30.72
                                                       30.32
                                                                29.83
                                                                          23.4
                                                                28.85
0.741935483870968
                            31.11
                                     30.98
                                              30.59
                                                       29.61
                                                                          23.16
                            30.19
                                              29.74
0.774193548387097
                                     30.03
                                                       28.83
                                                                28.17
                                                                          22.77
0.806451612903226
                            29.86
                                     29.69
                                              28.99
                                                       27.64
                                                                26.82
                                                                          22.41
0.838709677419355
                            28.99
                                     28.81
                                              28.62
                                                       27.61
                                                                26,73
                                                                          22.28
0.870967741935484
                            28.84
                                     28.68
                                              28.3
                                                       27.23
                                                                26.37
                                                                          21.53
0.903225806451613
                            27.51
                                     27.35
                                              27.01
                                                       26.61
                                                                26.08
                                                                          21.03
0.935483870967742
                            21.36
                                     21.23
                                              20.88
                                                       20.28
                                                                19.66
                                                                          13.6
0.967741935483871
                            14.28
                                     14.18
                                              13.9
                                                       13.3
                                                                12.76
                                                                          6.039
0.1
                            56.743
                                    53.886
                                              51.838
                                                      40.599
         58.126 57.781
                                              Average of yearly averages: 27.6899666666667
Inputs generated by pe5.pl - Novemeber 2006
Data used for this run:
Output File: NJn4GS52
Metfile: w93730.dvf
PRZM scenario:
                  NJnurserySTD_V2.txt
EXAMS environment file:
                           pond298.exv
Chemical Name:
                  Flurprimidol
Description
                  Variable Name
                                     Value
                                              Units
                                                       Comments
Molecular weight mwt
                            312.3
                                     g/mo!
Henry's Law Const.henry
                            3.97e-09 atm-m^3/mol
Vapor Pressure
                  vapr
                            3.64e-07 torr
Solubilitysol
                  130
                            mg/L
Κď
         Κd
                  .2.78
                            mg/L
                           mg/L
Koc
         Koc
Photolysis half-life kdp
                                              Half-life
                            1.4
                                     days
Aerobic Aquatic Metabolism kbacw
                                     O
                                              days
                                                       Halfife
Anaerobic Aquatic Metabolism
                                              0
                                                       days
                                                                Halfife
                                    kbacs
Aerobic Soil Metabolism
                           asm
                                     1444
                                              days
                                                       Halfife
Hydrolysis:
                                              Half-life
                  pH 7
                                    days
Method: CAM
                                    See PRZM manual
                           integer
Incorporation Depth:
                           DEPI
Application Rate: TAPP
                           0.84
                                    kg/ha
                            APPEFF 0.99
Application Efficiency:
                                              fraction
                                     fraction of application rate applied to pond
Spray Drift
                  DRFT
                           0.01
Application Date
                  Date
                           20-5
                                     dd/mm or dd/mmm or dd-mm or dd-mmm
                                    Set to 0 or delete line for single app.
Interval I interval
                  21
                           days
                           0.84
app. rate I
                  apprate
                                    kg/ha
Interval 2 interval
                  21
                           days
                                    Set to 0 or delete line for single app.
                           0.84
app. rate 2
                  apprate
                                    kg/ha
Interval 3 interval
                  21
                           days
                                    Set to 0 or delete line for single app.
                           0.84
app. rate 3
                  apprate
                                    kg/ha
Record 17:
                  FILTRA
         IPSCND 1
         UPTKF
Record 18:
                  PLVKRT
         PLDKRT
```

Flag for Index Res. Run IR EPA Pond

Flag for runoff calc. RUNOFFnone none, monthly or total(average of entire run)

stored as NJn4GS85.out Chemical: Flurprimidol

FEXTRC 0.5

PRZM environment: NJnurserySTD_V2.txt modified Sunday, 30 September 2007 at 23:05:00

EXAMS environment: pond298.exv modified Tueday, 26 August 2008 at 06:14:08 Metfile: w93730.dvf modified Tueday, 26 August 2008 at 06:16:14 Water segment concentrations (ppb)

Year	Peak	96 hr	21 Day	60 Day	90 Day	Yearly		
1961	21.35	21.2	20.57	20.04	19.52	5.854		
1962	41.66	41.42	40.69	39.85	39.44	22.6		
1963	43.79	43.55	42.83	42.71	42.34	34.45		
1964	41,13	40.89	39.9	37.85	36.68	32.4		
1965	33.18	33.17	33.16	32.57	31.6	27.2		
1966	58.96	58.54	56.87	53.65	52.12	31.06		
1967	47.94	47.68	46.61	45.11	44.24	37.92		
1968	39.04	38.81	37.88	37.56	37.1	33.18		
1969	34.71	34.49	33.7	33.2	32.16	28.07		
1970	34.15	33.96	33.55	32.51	31.48	26.43		
1971	69.9	69.51	68.1	65.51	63.31	37.09		
1972	59.19	58.89	57.66	55.33	54.04	47.21		
1973	51.27	51	49.89	47.54	45.96	39.3		
1974	45.64	45.33	44.38	42.66	40.7	32.78		
1975	38.84	38.62	37.92	36.56	35.66	31.07		
1976	52.73	52.41	51.21	48.66	47.42	33.27		
1977	47.54	47.39	46.69	45.43	43.98	39.06		
1978	40.24	40.24	40.23	40.21	39.69	34.14		
1979	31,52	31.4	30.78	30.07	29.58	25.94		
1980	30.61	30.41	30.21	29.77	29.29	25.02		
1981	28,46	28.3	28.25	27.75	26.93	23.77		
1982	24.75	24.63	24.3	23.9	23.43	20.8		
1983	28.98	28.81	28.16	27.5	27.13	20.55		
1984	26.94	26.78	26.12	25.57	25.34	22.18		
1985	26.13	25.96	25.71	25.15	25.04	20.99		
1986	30.14	29.97	29.4	28.84	27.27	20.26		
1987	31.41	31.2	30.45	29.12	28.79	24.68		
1988	31.6	31.41	30.99	30.47	29.41	23.79		
1989	54.03	53.67	52.34	50.72	49.92	30.52		
1990	48.02	47.76	46.69	44,42	42.81	36.08		
	,							
Sorted re	esults							
Prob.	Peak	96 hr	21 Day	60 Day	90 Day	Yearly		
	80645161		69.9	69.51	68.1	65.51	63.31	47.21
	51290322		59.19	58.89	57.66	55.33	54.04	39.3
0.096774	41935483	871	58.96	58.54	56.87	53.65	52.12	39.06
0.129032	22580645	16	54.03	53.67	52.34	50.72	49.92	37.92
0.161290	03225806	545	52.73	52.41	51.21	48.66	47.42	37.09
0.193548	83870967	74	51.27	51	49.89	47.54	45.96	36.08
	64516129		48.02	47.76	46.69	45.43	44.24	34.45
	45161290		47.94	47.68	46.69	45.11	43.98	34.14
	25806451			47.39	46.61	44.42	42.81	33.27
0.322580	06451612	9 45.64	45.33	44.38	42.71	42.34	33.18	
0.35483	87096774	119	43.79	43.55	42.83	42.66	40.7	32.78
0.38709	67741935	548	41.66	41.42	40.69	40.21	39.69	32.4
0.41935	48387096	577	41.13	40.89	40.23	39.85	39.44	31.07
0.451613	29032258	306	40.24	40.24	39.9	37.85	37.1	31.06
0.483870	09677419	936	39.04	38.81	37.92	37.56	36. 6 8	30.52
	90322580		38.84	38.62	37.88	36.56	35.66	28.07
0.54838	70967741	194	34.71	34.49	33.7	33.2	32.16	27.2
	51612903		34.15	33.96	33.55	32.57	31.6	26.43
	32258064		33.18	33.17	33.16	32.51	31.48	25.94
	12903225		31.6	31.41	30.99	30.47	29.58	25.02
	93548387		31.4	30.78	30,07	29.41	24.68	
	74193548		31.41	31.2	30.45	29.77	29.29	23.79
	54838709		30.61	30.41	30.21	29.12	28.79	23.77
0.77419	35483870	197	30.14	29.97	29.4	28.84	27.27	22.6
						83		

```
0.806451612903226
                            28.98
                                     28.81
                                              28,25
                                                       27.75
                                                                27.13
                                                                          22.18
0.838709677419355
                            28,46
                                     28.3
                                              28.16
                                                       27.5
                                                                          20.99
                                                                26.93
0.870967741935484
                            26.94
                                              26.12
                                                       25.57
                                     26.78
                                                                25.34
                                                                          20.8
0.903225806451613
                            26.13
                                     25.96
                                              25.71
                                                       25.15
                                                                25.04
                                                                          20.55
0.935483870967742
                            24,75
                                     24.63
                                              24.3
                                                       23.9
                                                                23.43
                                                                          20.26
0.967741935483871
                            21.35
                                     21.2
                                              20.57
                                                       20.04
                                                                19.52
                                                                          5.854
0.1
         58.467 58.053
                                              51.9
                            56.417
                                     53.357
                                                       38.946
                                              Average of yearly averages: 28.9221333333333
Inputs generated by pe5.pl - November 2006
Data used for this run:
Output File: NJn4GS85
Metfile: w93730.dvf
PRZM scenario:
                  NJnurserySTD_V2.txt
EXAMS environment file:
                           pond298.exv
Chemical Name:
                  Flurprimidol
Description
                  Variable Name
                                     Value
                                              Units
                                                       Comments
Molecular weight mwt
                                     g/mol
                            312.3
Henry's Law Const.henry
                            3.97e-09 atm-m^3/mol
Vapor Pressure
                  vapr
                            3.64e-07 torr
Solubilitysol
                  130
                            mg/L
Kd
         Κd
                  2.78
                           mg/L
Koc
         Koc
                           mg/L
Photolysis half-life kdp
                            1.4
                                              Half-life
                                    days
Aerobic Aquatic Metabolism kbacw
                                              days
                                                       Halfife
                                    Ð
Anaerobic Aquatic Metabolism
                                    kbacs
                                              0
                                                       days
                                                                Halfife
Aerobic Soil Metabolism
                                                       Halfife
                           aşm
                                    1444
                                              days
Hydrolysis:
                  pH 7
                                              Half-life
                                    days
Method: CAM
                           integer
                                    See PRZM manual
Incorporation Depth:
                           DEPI
                                    0
                                              cm
Application Rate: TAPP
                           0.84
                                    kg/ha
Application Efficiency:
                            APPEFF 0.99
                                              fraction
Spray Drift
                  DRFT
                                    fraction of application rate applied to pond
                           0.01
Application Date
                  Date
                           05-08
                                    dd/mm or dd/mmm or dd-mm or dd-mmm
Interval 1 interval
                  21
                           days
                                    Set to 0 or delete line for single app.
                           0.84
app. rate 1
                  apprate
                                    kg/ha
Interval 2 interval
                  21
                           days
                                    Set to 0 or delete line for single app.
                           0.84
app. rate 2
                  apprate
                                    kg/ha
Interval 3 interval
                  21
                           days
                                    Set to 0 or delete line for single app.
app, rate 3
                  apprate
                           0.84
Record 17:
                  FILTRA
         IPSCND 1
         UPTKF
Record 18:
                  PLVKRT
         PLDKRT
         FEXTRC 0.5
Flag for Index Res. Run
                           ΙR
                                    EPA Pond
Flag for runoff calc.
                           RUNOFFnone
                                             none, monthly or total(average of entire run)
stored as PAtur28h5.out
Chemical: Flurprimidol
                                    modified Thuday, 23 February 2006 at 18:55:08
PRZM environment: PAturfSTD.txt
                                    modified Tueday, 26 August 2008 at 06:14:08
EXAMS environment: pond298.exv
Metfile: w14751.dvf
                           modified Tueday, 26 August 2008 at 06:15:00
Water segment concentrations (ppb)
```

Year	Peak	96 hr	21 Day	60 Day	90 Day	Yearly
1961	7.805	7.747	7.55	7.199	6.916	2.853
1962	6.862	6.822	6.688	6.378	6.227	5.621
1963	5.944	5.944	5.944	5.943	5.87	5.278
1964	5.641	5.606	5.542	5.384	5.206	4.82

84

1965	4.84	4.811	4.694	4.488	4.436	4.178		
1966	18.17	18.03	17.6	16.56	15.86	7.207		
1967	14.14	14.06	13.75	13.32	13.06	11.8		
1968	15.87	15.76	15.35	14.58	14.09	10.46		
1969	13.07	13.70	12.85	12.64	12.27	11.09		
1970	10	10	9.998	9.987	9.875	8.701		
1971	9.675	9.613	9.447	9.139	8.852	7.09		
1972	12.98	12.91	12.68	12.21	11.98	8.918		
1973	19,39	19.26	18.81	17.85	17.2	10.63		
1974	14.68	14.61	14.35	13.75	13.3	11.9		
1975	10.32	10.28	10.1	9.7	9.404	8.816		
1976	9.359	9.306	9.097	8.644	8.411	7.324		
1970	8.091	8.091	8.089	8.085	7.969	6.736		
1977	6.778	6.74	6.652	6.515	6.42	5.669		
		7.702	7.592	7.352	7.108	5.536		
1979	7.741							
1980	7.506	7.462	7.284	7.004	6.532	5.795		
1981	6.779	6.778	6.773	6.654	6.463	5.861		
1982	7.216	7.176	7.056	6.867	6.756	5.682		
1983	5.262	5.239	5.144	4.931	4.775	4.487		
1984	5.05	5.022	4.988	4.953	4.918	4.218		
1985	6.201	6.16	6.054	5.778	5.626	4.268		
1986	6.124	6.092	6.017	5.923	5.805	5.142		
1987	7.608	7.565	7.515	7.276	7.07	5.562		
1988		6.198	6.117	6.099	6.022	5.579		
1989	8.679	8.629	8.532	8.324	8.168	6.017		
1990	7.3	7.267	7.126	6.94	6.902	6.474		
Sorted r	esults							
Prob.	Peak	96 hr	21 Day	60 Day	90 Day	Yearly		
0.03225	80645161	29	19.39	19.26	18.81	17.85	17.2	11.9
0.06451	61290322	581	18.17	18.03	17.6	16.56	15.86	11.8
0.09677	41935483	871	15.87	15.76	15.35	14.58	14.09	11.09
	22580645		14.68	14.61	14.35	13.75	13.3	10.63
0.16129	03225806	45	14.14	14.06	13.75	13.32	13.06	10.46
	83870967		13.07	13	12.85	12.64	12.27	8.918
	64516129		12.98	12.91	12.68	12.21	11.98	8.816
	45161290		10.32	10.28	10.1	9.987	9.875	8.701
	25806451		10	01	9.998	9.7	9.404	7.324
0.32258	06451612	9 9.675	9.613	9.447	9.139	8.852	7.207	
	87096774		9.359	9.306	9.097	8.644	8.411	7.09
0.38709	67741935	48	8.679	8.629	8.532	8.324	8.168	6.736
	48387096		8.091	8.091	8.089	8.085	7.969	6.474
	29032258		7.805	7.747	7.592	7.352	7.108	6.017
	09677419		7.741	7.702	7.55	7.276	7.07	5.861
	90322580		7.608	7.565	7.515	7.199	6.916	5.795
	70967741		7.506	7.462	7.284	7.004	6.902	5.682
	51612903		7.3	7.267	7.126	6.94	6.756	5.669
	32258064		7.216	7.176	7.056	6.867	6.532	5.621
	12903225		6.862	6.822	6.773	6.654	6.463	5.579
	93548387		6.778	6.688	6.515	6.42	5.562	5.5,
	74193548		6.778	6.74	6.652	6.378	6.227	5.536
	54838709		6.233	6.198	6.117	6.099	6.022	5.278
			6.201	6.16	6.054	5.943	5.87	5.142
	35483870		6.124	6.092	6.017	5.923	5.805	4.82
	16129032		5.944	5.944	5.944	5.778	5.626	4.487
	96774193		5.641	5.606	5.542	5.384	5.206	4.268
	77419354 59064514				5.342 5.144	4.953	4.918	4,218
	58064516 38700477		5.262	5.239		4.933	4.775	4,178
	38709677		5.05	5.022	4.988	4.931 4.488	4.775	
0.96774	19354838	07.1	4.84	4.811	4.694	+.+00	7. 4 .50	2,853
1.0	15.751	15.645	15.25	14.497	14.011	11.044		
					Average	-	averages:	6.7904
						O.F		

Inputs generated by pc5.pl - Novemeber 2006

Data used for this run: Output File: PAtur28h5 Metfile: w14751.dvf PRZM scenario: PAturfSTD.txt EXAMS environment file: pond298.exv Chemical Name: Flurprimidol Description Variable Name Value Units Comments Molecular weight mwt 312.3 g/mol 3.97e-09 atm-m^3/mol Henry's Law Const. henry Vapor Pressure vapr 3.64e-07 torr Solubilitysol 130 mg/L Κđ 2.78 Kd mg/L Koc Koc mg/L Photolysis half-life kdp 1.4 days Half-life Aerobic Aquatic Metabolism kbacw 0 days Halfife Anaerobic Aquatic Metabolism kbacs 0 days Halfife Aerobic Soil Metabolism asm 1444 days Halfife Hydrolysis: Half-life pH 7 days Method: CAM integer See PRZM manual Incorporation Depth: DEPI cm Application Rate: TAPP 0.291kg/ha Application Efficiency: APPEFF 0.99 fraction Spray Drift DRFT 0.01fraction of application rate applied to pond Application Date Date 5-5 dd/mm or dd/mmm or dd-mmm Interval 1 interval 14 Set to 0 or delete line for single app. days app. rate 1 apprate 0.291 kg/ha Interval 2 interval 14 Set to 0 or delete line for single app. days app, rate 2 apprate 0.291 kg/ha Interval 3 interval 14 days Set to 0 or delete line for single app. 0.291 app. rate 3 apprate kg/ha Interval 4 interval Set to 0 or delete line for single app. 14 days app, rate 4 apprate 0.291Interval 5 interval 14 days Set to 0 or delete line for single app. app. rate 5 apprate 0.291 Interval 6 interval [4 days Set to 0 or delete line for single app. 0.291 app. rate 6 apprate Interval 7 interval 14 days Set to 0 or delete line for single app. 0.291 app. rate 7 apprate kg/ha Interval 8 interval 14 Set to 0 or delete line for single app. days app. rate 8 0.291 apprate kg/ha Interval 9 interval 14 days Set to 0 or delete line for single app. app. rate 9 apprate 0.291 kg/ha Interval 10 interval 14 days Set to 0 or delete line for single app. 0.291 kg/ha app. rate 10 apprate Interval 11 interval 14 days Set to 0 or delete line for single app. apprate 0.160 kg/ha app. rate 11 Record 17: **FILTRA** IPSCND 1 UPTKF **PLVKRT** Record 18: PLDKRT FEXTRC 0.5 EPA Pond Flag for Index Res. Run ΙR Flag for runoff calc. RUNOFFnone none, monthly or total(average of entire run) stored as PAtur28h6.out Chemical: Flurprimidol PRZM environment: PAturfSTD.txt modified Thuday, 23 February 2006 at 18:55:08 modified Tueday, 26 August 2008 at 06:14:08 EXAMS environment: pond298.exv modified Tueday, 26 August 2008 at 06:15:00 Metfile: w14751.dvf

Year	Peak	96 hr	21 Day	60 Day	90 Day	Yearly		
1961	5.422	5.383	5.281	5.123	5.023	2.183		
1962	5.968	5.932	5.85	5.794	5.708	4.53		
1963	5.718	5.688	5.565	5.558	5.486	4.974		
1964	5.594	5.561	5.484	5.38	5.314	4.955		
1965	4.83	4.811	4.809	4.805	4.746	4.38		
1966	17.98	17.85	17.4	16.47	15.85	7.245		
1967	14.34	14.27	13.95	13.51	13.24	11.62		
1968	10.42	10.35	10.14	9.846	9.739	8.843		
1969	10.43	10.37	10.26	9.895	9.66	8.324		
1970	8.345	8.344	8.343	8.338	8.242	7.385		
1971	8.704	8.648	8.507	8.281	8.111	6.536		
1972	20.39	20.26	19.79	18.86	18.3	11.98		
1973	23.11	22.96	22.41	21.49	20.88	14.96		
1974	18.21	18.13	17.8	17.06	16.5	14.35		
1975	18.01	17.91	17.51	16.84	16.34	11. 7 7		
1976	18.1	17.99	17.63	16.82	16.19	12.96		
1977	15.82	15.82	15.81	15.78	15.55	12.46		
1978	10.1	10.1	10.09	10.09	9.963	8.973		
1979	9.145	9.099	8.99	8.809	8.567	7.221		
1980	9.383	9.324	9.121	8.811	7.913	6.577	:	
1981	8.543	8.54	8.528	8.369	8.124	7.139		
1982	6,298	6.298	6.295	6.286	6.215	5.598		
1983	5.037	5.014	4.921	4.713	4.561	3.988		
1984	3.891	3.891	3.891	3.829	3.725	3.57		
1985	6.421	6.376	6.271	6.117	6.016	3.902		
1986	7.552	7.508	7.413	7.233	7.1	5.859		
1987	7.615	7.568	7.481	7.327	7.289	6.214		
1988	6.716	6.716	6.715	6.711	6.624	5.952		
1989	8.089	8.04	7.922	7.744	7.731	5.574		
1990	7.636	7.589	7.454	7.271	6.862	6.062		
					*****	5.00		
		***************************************			*****	5.002		
Sorted	results			s.				
Sorted :	results Peak	96 hr	21 Day	60 Day	90 Day	Yearly	20.80	14.06
Sorted a Prob. 0.03225	results Peak 580645161	96 hr 1 2 9	21 Day 23.11	60 Day 22.96	90 Day 22,41	Yearly 21.49	20.88	14.96
Sorted a Prob. 0.03225 0.06451	results Peak 580645161	96 hr 129 1581	21 Day 23.11 20.39	60 Day 22.96 20.26	90 Day 22,41 19,79	Yearly 21.49 18.86	18.3	14.35
Sorted a Prob. 0.03223 0.06451 0.09677	results Peak 580645161 161290322 741935483	96 hr 129 1581 1871	21 Day 23.11 20.39 18.21	60 Day 22.96 20.26 18.13	90 Day 22,41 19,79 17,8	Yearly 21.49 18.86 17.06	18.3 16.5	14.35 12.96
Sorted a Prob. 0.03223 0.06451 0.09677 0.12903	results Peak 580645161 161290322 741935483 322580645	96 hr 129 1581 1871	21 Day 23.11 20.39 18.21 18.1	60 Day 22.96 20.26 18.13 17.99	90 Day 22.41 19.79 17.8 17.63	Yearly 21.49 18.86 17.06 16.84	18.3 16.5 16.34	14.35 12.96 12.46
Sorted a Prob. 0.03223 0.06451 0.09677 0.12903 0.16129	results Peak 580645161 161290322 741935483 322580645 903225806	96 hr 129 1581 1871 116 145	21 Day 23.11 20.39 18.21 18.1 18.01	60 Day 22.96 20.26 18.13 17.99 17.91	90 Day 22,41 19.79 17.8 17.63 17.51	Yearly 21.49 18.86 17.06 16.84 16.82	18.3 16.5 16.34 16.19	14.35 12.96 12.46 11.98
Sorted a Prob. 0.03225 0.06451 0.09677 0.12903 0.16129 0.19354	results Peak 580645161 161290322 741935483 322580645 903225806	96 hr 129 1581 1871 516 645 174	21 Day 23.11 20.39 18.21 18.1 18.01 17.98	60 Day 22.96 20.26 18.13 17.99 17.91 17.85	90 Day 22.41 19.79 17.8 17.63 17.51 17.4	Yearly 21.49 18.86 17.06 16.84 16.82	18.3 16.5 16.34 16.19 15.85	14.35 12.96 12.46 11.98 11.77
Sorted a Prob. 0.03225 0.06451 0.09677 0.12903 0.16129 0.19354 0.22580	results Peak 580645161 161290322 741935483 322580643 903225806 183870967	96 hr 129 1581 1871 516 645 174	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78	18.3 16.5 16.34 16.19 15.85 15.55	14.35 12.96 12.46 11.98 11.77 11.62
Sorted a Prob. 0.03225 0.06451 0.09677 0.12903 0.16129 0.19354 0.22580	results Peak 580645161 161290322 741935483 322580645 903225806 183870967 064516129	96 hr 129 1581 1871 516 645 774 903 332	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51	18.3 16.5 16.34 16.19 15.85 15.55 13.24	14.35 12.96 12.46 11.98 11.77 11.62 8.973
Sorted : Prob. 0.03225 0.06451 0.09677 0.12903 0.16129 0.2580 0.2580 0.29032	results Peak 580645161 61290322 741935483 322580645 903225806 983870967 0645161290 225806451	96 hr 129 1581 1871 516 545 174 1003 132	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09	18.3 16.5 16.34 16.19 15.85 15.55 13.24 9.963	14.35 12.96 12.46 11.98 11.77 11.62
Sorted a Prob. 0.03225 0.06451 0.09677 0.12903 0.16125 0.2580 0.2580 0.29032 0.32258	results Peak 580645161 161290322 741935483 322580645 903225806 883870967 064516129 225806451612	96 hr 129 1581 1871 1616 1645 1774 1903 132 161 19 10.42	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739	18.3 16.5 16.34 16.19 15.85 15.55 13.24 9.963 8.324	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843
Sorted a Prob. 0.03225 0.06451 0.09677 0.12903 0.16129 0.2580 0.2580 0.29032 0.32258 0.35483	results Peak 580645161 661290322 741935483 322580645 903225806 883870967 64516129 625806451612 38709677	96 hr 129 1581 1871 1616 1645 1774 1003 1032 161 19 10.42	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846	18.3 16.5 16.34 16.19 15.85 15.55 13.24 9.963 8.324 9.66	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843
Sorted a Prob. 0.03225 0.06451 0.09677 0.12903 0.16129 0.22580 0.25806 0.29032 0.32258 0.35483 0.38709	results Peak 580645161 61290322 741935483 822580645 903225806 83870967 64516129 62258064518 806451612 887096774	96 hr 129 1581 1871 516 545 174 903 132 161 29 10.42 119	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1 9.383	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1 9.324	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09 9.121	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846 8.811	18.3 16.5 16.34 16.19 15.85 15.55 13.24 9.963 8.324 9.66 8.567	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843 7.385 7.245
Sorted a Prob. 0.03223 0.06451 0.09677 0.12903 0.16129 0.22580 0.25806 0.29032 0.32258 0.35483 0.38709 0.41933	results Peak 580645161 61290322 741935483 822580645 903225806 83870967 64516129 6258064516 806451612 887096774	96 hr 129 1581 1871 516 545 174 903 132 161 29 10.42 119 548	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1 9.383 9.145	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1 9.324 9.099	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09 9.121 8.99	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846 8.811 8.809	18.3 16.5 16.34 16.19 15.85 15.55 13.24 9.963 8.324 9.66 8.567 8.242	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843 7.385 7.245 7.221
Sorted : Prob. 0.03225 0.06451 0.09677 0.12903 0.16129 0.2580 0.2580 0.29032 0.32258 0.35483 0.38709 0.41935 0.45161	results Peak 580645161 61290322 741935483 822580645 903225806 964516129 92258064518 806451612 967741935	96 hr 129 1581 1871 516 545 174 903 132 161 29 10.42 119 548 577	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1 9.383 9.145 8.704	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1 9.324 9.099 8.648	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09 9.121 8.99 8.528	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846 8.811 8.809 8.369	18.3 16.5 16.34 16.19 15.85 15.55 13.24 9.963 8.324 9.66 8.567 8.242 8.124	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843 7.385 7.245 7.221 7.139
Sorted a Prob. 0.03223 0.06451 0.09677 0.12903 0.16129 0.22580 0.25806 0.29032 0.35258 0.35483 0.38709 0.41933 0.45161 0.48383	results Peak 580645161 61290322 741935483 822580645 903225806 964516129 02258064518 806451612 96774193 548387096 129032258	96 hr 129 1581 1871 516 545 174 1003 132 161 29 10.42 119 548 577 806	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1 9.383 9.145 8.704 8.543	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1 9.324 9.099 8.648 8.54	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09 9.121 8.99 8.528 8.507	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846 8.811 8.809 8.369 8.338	18.3 16.5 16.34 16.19 15.85 15.55 13.24 9.963 8.324 9.66 8.567 8.242 8.124 8.111	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843 7.385 7.245 7.221 7.139 6.577
Sorted a Prob. 0.03223 0.06451 0.09677 0.12903 0.16129 0.2580 0.2580 0.29032 0.35258 0.35483 0.38709 0.41933 0.45161 0.48383 0.51612	results Peak 580645161 61290322 741935483 822580645 903225806 645161290 625806451612 887096774 96774193 548387096 129032258 709677415	96 hr 129 1581 1871 516 545 174 903 132 161 29 10.42 119 548 577 806 936	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1 9.383 9.145 8.704 8.543 8.345	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1 9.324 9.099 8.648 8.54 8.344	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09 9.121 8.99 8.528 8.507 8.343	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846 8.811 8.809 8.369 8.338 8.281	18.3 16.5 16.34 16.19 15.85 15.55 13.24 9.963 8.324 9.66 8.567 8.242 8.124 8.111 7.913	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843 7.385 7.245 7.221 7.139 6.577 6.536
Sorted a Prob. 0.03223 0.06451 0.09677 0.12903 0.16129 0.2580 0.2580 0.29032 0.35483 0.38709 0.41933 0.45161 0.48383 0.51612	results Peak 580645161 61290322 741935483 822580645 83870967 64516129 62258064516129 624516129 62741935 648387096 629032258 6370967741 6370967741	96 hr 129 1581 1871 516 545 774 903 932 161 29 10.42 419 548 577 806 936 965	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1 9.383 9.145 8.704 8.543 8.345 8.089	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1 9.324 9.099 8.648 8.54 8.344 8.04	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09 9.121 8.99 8.528 8.507	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846 8.811 8.809 8.369 8.338 8.281 7.744	18.3 16.5 16.34 16.19 15.85 15.55 13.24 9.963 8.324 9.66 8.567 8.242 8.124 8.111	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843 7.385 7.245 7.221 7.139 6.577
Sorted a Prob. 0.03225 0.06451 0.09677 0.12903 0.16129 0.2580 0.29032 0.32258 0.35483 0.41935 0.45161 0.54838 0.51612 0.54838 0.58064	results Peak 580645161 61290322 741935483 822580645 83870967 645161290 22580645161290 645161290 645161290 645161290 645161290 645161290	96 hr 129 1581 1871 516 545 774 903 932 161 29 10.42 419 548 577 806 936 965 194	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1 9.383 9.145 8.704 8.543 8.345 8.089 7.636	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1 9.324 9.099 8.648 8.54 8.344 8.04 7.589	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09 9.121 8.99 8.528 8.507 8.343 7.922 7.481	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846 8.811 8.809 8.369 8.338 8.281 7.744 7.327	18.3 16.5 16.34 16.19 15.85 15.55 13.24 9.963 8.324 9.66 8.567 8.242 8.124 8.111 7.913 7.731	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843 7.385 7.245 7.221 7.139 6.577 6.536 6.214
Sorted a Prob. 0.03225 0.06451 0.09677 0.12903 0.16129 0.2580 0.29032 0.32258 0.35483 0.41935 0.41935 0.51612 0.54838 0.51612 0.54838 0.58064 0.61296	results Peak 580645161 61290322 741935483 822580645 83870967 645161290 22580645161290 645161290 645161290 645161290 645161290 645161290	96 hr 129 1581 1871 516 545 774 903 932 161 29 10.42 419 548 577 806 936 936 965 194 323 452	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1 9.383 9.145 8.704 8.543 8.345 8.089 7.636 7.615	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1 9.324 9.099 8.648 8.54 8.344 8.04 7.589 7.568	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09 9.121 8.99 8.528 8.507 8.343 7.922	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846 8.811 8.809 8.369 8.338 8.281 7.744	18.3 16.5 16.34 16.19 15.85 15.55 13.24 9.963 8.324 9.66 8.567 8.242 8.124 8.111 7.913 7.731 7.289	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843 7.385 7.245 7.221 7.139 6.577 6.536 6.214 6.062
Sorted a Prob. 0.03225 0.06451 0.09677 0.12903 0.16129 0.2580 0.29032 0.32258 0.35483 0.41935 0.45161 0.54838 0.51612 0.54838 0.58064 0.61296 0.64516	results Peak 580645161 61290322 741935483 822580645 83870967 645161290 22580645161290 645161290 645161290 645161290 645161290 645161290 645161290	96 hr 129 1581 1871 516 545 774 903 932 161 29 10.42 419 548 577 806 936 965 194 323 452	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1 9.383 9.145 8.704 8.543 8.345 8.089 7.636 7.615 7.552	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1 9.324 9.099 8.648 8.54 8.344 8.04 7.589 7.568 7.508	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09 9.121 8.99 8.528 8.507 8.343 7.922 7.481 7.454 7.413	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846 8.811 8.809 8.369 8.338 8.281 7.744 7.327 7.271 7.233	18.3 16.5 16.34 16.19 15.85 15.55 13.24 9.963 8.324 9.66 8.567 8.242 8.124 8.111 7.913 7.731 7.289 7.1	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843 7.385 7.245 7.221 7.139 6.577 6.536 6.214 6.062 5.952
Sorted a Prob. 0.03225 0.06451 0.09677 0.12903 0.16129 0.2580 0.29032 0.32258 0.35483 0.41935 0.45161 0.54838 0.51612 0.54838 0.51612 0.64516 0.67741 0.67741	results Peak 580645161 61290322 741935483 822580645 803225806 83870967 64516129 625806451612 870967741 929032258 870967741 451612903 032258064 6129032258 61290322580 61290322580	96 hr 129 1581 1871 516 545 774 903 932 161 29 10.42 419 548 577 806 936 965 194 323 452 581 71 6.716	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1 9.383 9.145 8.704 8.543 8.345 8.089 7.636 7.615 7.552 6.716	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1 9.324 9.099 8.648 8.54 8.344 8.04 7.589 7.568 7.508 6.715	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09 9.121 8.99 8.528 8.507 8.343 7.922 7.481 7.454	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846 8.811 8.809 8.369 8.338 8.281 7.744 7.327 7.271	18.3 16.5 16.34 16.19 15.85 15.55 13.24 9.963 8.324 9.66 8.567 8.242 8.124 8.111 7.913 7.731 7.289 7.1 6.862	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843 7.385 7.245 7.221 7.139 6.577 6.536 6.214 6.062 5.952
Sorted a Prob. 0.03225 0.06451 0.09677 0.12903 0.16129 0.2580 0.29032 0.32258 0.35483 0.41935 0.45161 0.54838 0.51612 0.54838 0.51612 0.64516 0.67741 0.70965	results Peak 580645161 61290322 741935483 822580645 83870967 645161290 22580645161290 645161290 645161290 645161290 645161290 645161290 645161290 645161290 645161290 645161290 645161290 645161290 645161290 645161290 645161290	96 hr 129 1581 1871 516 545 774 903 932 161 29 10.42 419 548 577 806 936 965 194 323 452 581 71 6.716	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1 9.383 9.145 8.704 8.543 8.345 8.089 7.636 7.615 7.552 6.716 6.421	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1 9.324 9.099 8.648 8.54 8.344 8.04 7.589 7.568 7.508	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09 9.121 8.99 8.528 8.507 8.343 7.922 7.481 7.454 7.413 6.711	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846 8.811 8.809 8.369 8.338 8.281 7.744 7.327 7.271 7.233 6.624	18.3 16.5 16.34 16.19 15.85 15.55 13.24 9.963 8.324 9.66 8.567 8.242 8.124 8.111 7.913 7.731 7.289 7.1 6.862 5.598	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843 7.385 7.245 7.221 7.139 6.577 6.536 6.214 6.062 5.952 5.859
Sorted : Prob. 0.03225 0.06451 0.0967 0.12903 0.16129 0.2580 0.29032 0.32258 0.35483 0.41935 0.45161 0.54838 0.51612 0.54838 0.51612 0.64516 0.67741 0.70965 0.74193	results Peak 580645161 61290322 741935483 822580645 803225806 83870967 64516129 625806451612 870967741 929032258 870967741 451612903 032258064 6129032258 61290322580 61290322580	96 hr 129 1581 1871 516 545 774 903 932 161 29 10.42 419 548 577 806 936 965 194 323 452 581 71 6.716	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1 9.383 9.145 8.704 8.543 8.345 8.089 7.636 7.615 7.552 6.716 6.421 6.298	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1 9.324 9.099 8.648 8.54 8.344 8.344 8.04 7.589 7.568 7.508 6.715 6.376	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09 9.121 8.99 8.528 8.507 8.343 7.922 7.481 7.454 7.413 6.711 6.295	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846 8.811 8.809 8.369 8.338 8.281 7.744 7.327 7.271 7.233 6.624 6.286	18,3 16,5 16,34 16,19 15,85 15,55 13,24 9,963 8,324 9,66 8,567 8,242 8,124 8,111 7,913 7,731 7,289 7,1 6,862 5,598 6,215	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843 7.385 7.245 7.221 7.139 6.577 6.536 6.214 6.062 5.952 5.859
Sorted : Prob. 0.03225 0.06451 0.0967 0.12903 0.16129 0.2580 0.29032 0.32258 0.35483 0.41935 0.51612 0.54838 0.51612 0.54838 0.51612 0.64516 0.67741 0.70965 0.77419 0.77419	results Peak 580645161 61290322 741935483 822580645 83870967 645161290 225806451612 887096774 967741935 548387096 7741935258064516129032258 67967741 816129032258 67967741 816129032258 67967741 816129032258 67967741 816129032258 67967741	96 hr 129 1581 1871 1616 1645 174 1003 1032 161 129 10.42 119 1648 1677 1665 194 1623 1652 168 171 16.716 168 1997	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1 9.383 9.145 8.704 8.543 8.345 8.089 7.636 7.615 7.552 6.716 6.421	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1 9.324 9.099 8.648 8.54 8.344 8.04 7.589 7.568 7.508 6.715 6.376 6.298	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09 9.121 8.99 8.528 8.507 8.343 7.922 7.481 7.454 7.413 6.711 6.295 6.271	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846 8.811 8.809 8.369 8.338 8.281 7.744 7.327 7.271 7.233 6.624 6.286 6.117	18,3 16,5 16,34 16,19 15,85 15,55 13,24 9,963 8,324 9,66 8,567 8,242 8,124 8,111 7,913 7,731 7,289 7,1 6,862 5,598 6,215 6,016	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843 7.385 7.245 7.221 7.139 6.577 6.536 6.214 6.062 5.952 5.859 5.574 4.974 4.955 4.53
Sorted a Prob. 0.03225 0.06451 0.0967 0.12903 0.16129 0.2580 0.29032 0.32258 0.35483 0.41935 0.45161 0.54838 0.51612 0.54838 0.51612 0.64516 0.67741 0.7096 0.7419 0.77419 0.80645	results Peak 580645161 61290322 741935483 822580645 83870967 645161290 825806451612 8870967741 967741935 848387096 870967741 910322580 870967741 910322580 870967741 910322580 870967741	96 hr 129 1581 1871 1616 1645 174 1003 1032 161 129 10.42 119 1648 1677 1806 194 1623 1452 181 171 16.716 1839 1968 1997 1226	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1 9.383 9.145 8.704 8.543 8.345 8.089 7.636 7.615 7.552 6.716 6.421 6.298 5.968	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1 9.324 9.099 8.648 8.54 8.344 8.04 7.589 7.568 7.508 6.715 6.376 6.298 5.932	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09 9.121 8.99 8.528 8.507 8.343 7.922 7.481 7.454 7.413 6.711 6.295 6.271 5.85	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846 8.811 8.809 8.369 8.338 8.281 7.744 7.327 7.271 7.233 6.624 6.286 6.117 5.794	18,3 16,5 16,34 16,19 15,85 15,55 13,24 9,963 8,324 9,66 8,567 8,242 8,124 8,111 7,913 7,731 7,289 7,1 6,862 5,598 6,215 6,016 5,708	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843 7.385 7.245 7.221 7.139 6.577 6.536 6.214 6.062 5.952 5.859 5.574 4.974 4.955
Sorted a Prob. 0.03225 0.06451 0.0967 0.12903 0.16129 0.2580 0.29032 0.32258 0.35483 0.41935 0.45161 0.54838 0.51612 0.54838 0.51612 0.64516 0.67741 0.7096 0.7419 0.77419 0.80645	results Peak 580645161 61290322 741935483 822580645 83870967 645161290 22580645161290 62580645161290 62580645161290 62580645161290 63548387096 61290322580 6451612903 635483870 635483870 635483870	96 hr 129 1581 1871 1616 1645 174 1003 1032 161 129 10.42 119 1648 1677 1806 194 1623 1452 181 171 16.716 1839 1968 1997 1226	21 Day 23.11 20.39 18.21 18.1 18.01 17.98 15.82 14.34 10.43 10.35 10.1 9.383 9.145 8.704 8.543 8.345 8.089 7.636 7.615 7.552 6.716 6.421 6.298 5.968 5.718	60 Day 22.96 20.26 18.13 17.99 17.91 17.85 15.82 14.27 10.37 10.14 10.1 9.324 9.099 8.648 8.54 8.344 8.04 7.589 7.568 7.508 6.715 6.376 6.298 5.932 5.688	90 Day 22.41 19.79 17.8 17.63 17.51 17.4 15.81 13.95 10.26 9.895 10.09 9.121 8.99 8.528 8.507 8.343 7.922 7.481 7.454 7.413 6.711 6.295 6.271 5.85 5.565	Yearly 21.49 18.86 17.06 16.84 16.82 16.47 15.78 13.51 10.09 9.739 9.846 8.811 8.809 8.369 8.338 8.281 7.744 7.327 7.271 7.233 6.624 6.286 6.117 5.794 5.558	18.3 16.5 16.34 16.19 15.85 15.55 13.24 9.963 8.324 9.66 8.567 8.242 8.124 8.111 7.913 7.731 7.289 7.1 6.862 5.598 6.215 6.016 5.708 5.486	14.35 12.96 12.46 11.98 11.77 11.62 8.973 8.843 7.385 7.245 7.221 7.139 6.577 6.536 6.214 6.062 5.952 5.859 5.574 4.974 4.955 4.53

131

```
0.870967741935484
                           5.422
                                     5.383
                                             5.281
                                                       5.123
                                                                5.023
                                                                         3.988
0.903225806451613
                           5.037
                                             4.921
                                    5.014
                                                       4.805
                                                                4.746
                                                                         3.902
0.935483870967742
                                             4.809
                           4.83
                                    4.811
                                                       4.713
                                                                4.561
                                                                         3.57
0.967741935483871
                           3.891
                                             3.891
                                    3.891
                                                       3.829
                                                                3.725
                                                                         2.183
0.1
         18.199
                  18.116
                           17.783
                                    17.038
                                             16.484
                                                      12.91
                                             Average of yearly averages: 7.53613333333333
```

Inputs generated by pe5.pl - Novemeber 2006

```
Data used for this run:
Output File: PAtur28h6
Metfile: w14751.dvf
PRZM scenario:
                    PAturfSTD.txt
EXAMS environment file:
                             pond298.exv
                   Flurprimidol
Chemical Name:
Description
                    Variable Name
                                       Value
                                                 Units
                                                           Comments
Molecular weight mwt
                              312.3
                                       g/mol
                              3.97e-09 atm-m^3/mol
Henry's Law Const.henry
Vapor Pressure
                              3.64c-07 torr
                    vapr
Solubilitysol
                    130
                              mg/L
Kď
          Κď
                    2.78
                             mg/L
Koc
          Koc
                             mg/L
Photolysis half-life kdp
                                                 Half-life
                              1.4
                                       days
Aerobic Aquatic Metabolism kbacw
                                                 days
                                                           Halfife
Anaerobic Aquatic Metabolism
                                                 0
                                                                    Halfife
                                       kbacs
                                                           days
Aerobic Soil Metabolism
                                       1444
                                                 days
                                                           Halfife
Hydrolysis:
                   pH 7
                                                 Half-life
                                       days
Method: CAM
                                       See PRZM manual
                             integer
Incorporation Depth:
                             DEPI
                                                 cm
Application Rate: TAPP
                             0.291
                                       kg/ha
Application Efficiency:
                             APPEFF 0.99
                                                 fraction
Spray Drift
                   DRFT
                                       fraction of application rate applied to pond
                             0.01
Application Date
                   Date
                                       dd/mm or dd/mmm or dd-mm or dd-mmm
                             5-6
Interval I interval
                   14
                                       Set to 0 or delete line for single app.
                             days
                                       kg/ha
app. rate 1
                   apprate
                             0.291
Interval 2 interval
                   14
                             days
                                       Set to 0 or delete line for single app.
app. rate 2
                   apprate
                             0.291
                                       kg/ha
Interval 3 interval
                                       Set to 0 or delete line for single app.
                             days
app. rate 3
                             0.291
                   apprate
Interval 4 interval
                   14
                             days
                                       Set to 0 or delete line for single app.
                             0.291
app. rate 4
                   apprate
Interval 5 interval
                                       Set to 0 or delete line for single app.
                   14
                             days
                             0.291
app. rate 5
                   apprate
                                       kg/ha
                                       Set to 0 or delete line for single app.
Interval 6 interval
                   14
                             days
                             0.291
app. rate 6
                   apprate
                                       kg/ha
Interval 7 interval
                   14
                                       Set to 0 or delete line for single app.
                             days
                             0.291
app. rate 7
                   apprate
                                       kg/ha
Interval 8 interval
                             days
                   14
                                       Set to 0 or delete line for single app.
                             0.291
app. rate 8
                   apprate
                                       kg/ha
Interval 9 interval
                   14
                                       Set to 0 or delete line for single app.
                             days
app. rate 9
                             0.291
                                       kg/ha
                   apprate
Interval 10
                   interval
                             14
                                       days
                                                 Set to 0 or delete line for single app.
                             0.291
app. rate 10
                   apprate
                                       kg/ha
                                                 Set to 0 or delete line for single app.
Interval 11
                   interval
                             14
                                       days
app. rate 11
                   apprate
                             0.160
                                       kg/ha
Record 17:
                   FILTRA
         IPSCND 1
```

UPTKF

Record 18: PLVKRT

PLDKRT FEXTRC 0.5 Flag for Index Res. Run Flag for runoff cale.

IR EPA Pond RUNOFFnone n

none, monthly or total (average of entire run)

APPENDIX C: T-REX EECs

RESULTS- Upper Bound EECs and RQs for 4 Applications at 0.75 lb ai/A with a 14-day Interval

Upper Bound Kenaga Res	idues For RQ Calculation			
Chemical Name:	Flurprimidol			
Use:	Turf Grass / Ornamentals			
Formulation:	Cutless 50W Turf Growth			
	Regulator			
Application Rate:	0.75 lbs ai/A			
Half-life:	35 days			
Application Interval:	14 days			
Maximum # Apps./Year:	4 applications			
Length of Simulation:	1 year			

Endpoints			
	Bobwhite quail	LD50 (mg/kg-bw)	>2000
Avian	Bobwhite quail	LC50 (mg/kg-diet)	>4310
	Mailard duck	NOAEL(mg/kg-bw)	0.00
•	Mallard duck	NOAEC (mg/kg-diet)	309
		LD50 (mg/kg-bw)	709
Mammals		LC50 (mg/kg-dlet)	0.00
Manimais		NOAEL (mg/kg-bw)	7.3
		NOAEC (mg/kg-diet)	100

Dietary-Based EECs						
Food Items	Upper Bound EEC (mg ai/kg)	Mean EEC (mg ai/kg)				
Short Grass	498.15	176.43				
Tali Grass	228.32	74.72				
Sm. Insects, Broadleaf Plants	280.21	93.4				
Lg. Insects, Fruits, Pods	31.13	14.5				

AVIAN EECs and ADJUSTED LD50s

Avian Class	ss Body Weight Ingestion (Fdry) (g) (g bw/day		Ingestion (Fwet) (g/day)	% body wgt consumed	FI (kg-diet/day)	
Small	20	5	23	114	2.28E-02	
Mid	100	13	65	65	6.49E-02	
Large	1000	58	291	29	2.91E-01	

Avian Body Weight (g)	Adjusted LD50 (mg/kg-bw)
20	>1440.86
100	>1834,29
1000	>2591

	ng/kg-bw) Avlan C	lasses and Body	Weights
Food items	small	mld	large
	20 g	100 g	1000 g
Uppe	r Bound EEC (m	g/kg)	
Short Grass	567.34	323.52	144.84
Tall Grass	260.03	148.28	66.39
Sm. Insects, Broadleaf Plants	319.13	181.98	81.48
Lg. Insects, Fruits, Pods	35.46	20.22	9.05
M	ean EEC (mg/kg)	
Short Grass	200.93	114.58	51.30
Tall Grass	85.10	48.53	21.73
Sm. Insects, Broadleaf Plants	106.38	60.66	27.16
Lg. Insects, Fruits, Pods	16.55	9.44	4.22

MAMMALIAN EECs and ADJUSTED LD50s

Mammalian Class	Body Weight	Ingestion (Fdry) (g bwt/day)	Ingestion (Fwet) (g/day)	% body wgt consumed	FI (kg-diet/day)	
Herbivores/	15	3	14	95	1.43E-02	
insectivores	35	5	23	66	2.31E-02	
Illaectivotes	1000	31	153	15	1.53E-01	
	15	3	3	21	3.18E-03	
Granivores	35	5	5	15	5.13E-03	
,	1000	31	34	.3	3.40E-02	

Mammalian Class	Body Weight	Adjusted LD50	Adjusted NOAEL
Horbitores/	15	1558.26	16.04
Herbivores/ insectivores	35	1260.80	12.98
insectivores	1000	545.33	5.61
	15	1558.26	16.04
Granivores	35	1260.80	12.98
Ī	1000	545.33	5.61

Dose-based EECs	Mammalian Classes and Body Weight							
(mg/kg-bw)	Herbivo	res and Ins	ectivores		3			
(g g,	15 g	35 g	1000 g	15 g	35 g	1000 g		
	Upper Bot	ınd EECs (n	ng ai/kg)			•		
Short Grass	474.94	328.25	76.11			·		
Tall Grass	217.68	150.45	34.88					
Broadleaf plants and small insects	267.16	184.64	42.81					
Fruits/pods/seeds/large insects	29.68	20.52	4.76	6.60	4.56	1.06		
	Mean	EECs (mg a	i/kg)	•				
Short Grass	168.21	116.26	26.95					
Tall Grass	71.24	49.24	11.42					
Broadleaf plants and small insects	89.05	61.55	14.27					
Fruits/pods/seeds/large insects	13.85	9.57	2.22	3.08	2.13	0.49		

Ta	ible C1. Upper (4 App	Bound K						tients	
EECs and RQs									
Size Class (grams)	Adjusted LD50	Short	ort Grass Tall Grass Broadleaf Plants/ Small Insects		rass Tall Grass P		ıts/	Fruits/Pods/ Seeds/ Large Insects	
		EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ
20	>1440.86	567.34	N/A	260.03	N/A	319.13	N/A	35.46	N/A
100	>1834.29	323.52	N/A	148.28	N/A	181.98	N/A	20.22	N/A
1000	>2591.00	144.84	N/A	66.39	N/A	81.48	N/A	9.05	N/A

⁻Bold value indicates LOC exceedance

⁻N/A – Acute toxicity threshold was greater than the highest dose tested; risk is expected to be minimal; thus, RQs were not calculated

Table C	2. Upper B (4 Ap				vian Dietar vith 14 Day			tients	
				EECs a	nd RQs	_		., <u> </u>	
i	Short G	rass	Tall G	rass	Broadleaf Plants/ Small Insects		See	Fruits/Pods/ Seeds/ Large Insects	
LC50	50 EEC RQ EEC RQ		EEC	RQ	EEC	RQ			
>4310	498.15	N/A	228.32	N/A	280.21	N/A	31.13	N/A	

⁻Size class not used for dietary risk quotients

⁻Bold value indicates LOC exceedance

⁻N/A - Acute toxicity threshold was greater than the highest dose tested; risk is expected to be minimal; thus, RQs were not calculated

Table C3. U	pper Boun (4 Applica		Ψ,		_		_	tients		
	EECs and RQs									
NOAEC	Short Grass		Tall Grass		Broadleaf Plants/ Small Insects		Fruits/Pods/ Seeds/ Large Insects			
(mg/kg-diet)	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ		
309	498.15	1.61	228.32	0.74	280.21	0.91	31.13	0.10		

Size class not used for dietary risk quotients Bold values indicate LOC exceedances

	Table C4, U					alian Dos h 14 Day			otients				
EECs and RQs													
Size Class (grams)	Adjusted LD50	Short (Frass	rss Tall Grass		Broadleaf Plants/ Small Insects		Plants/		Fruits/Pods/ Seeds/ Large Insects		Granivores	
	_	EEC	RQ	DEEC RO EEC RO EEC RO EEC					EEC	RQ			
15	1558.26	474.94							0.00				
35	1260.80	328.25	28.25 0.26 150.45 0.12 184.64 0.15 20.52 0.02 4.56 0.00							0.00			
1000	545.33	76.11	0.14	34.88	0.06	42.81	0.08	4.76	0.01	1.06	0.00		

	Table C5. Upper Bound Kenaga, Chronic Mammalian Dietary Based Risk Quotients (4 Applications @ 0.75 lb ai/A with 14 Day Intervals)									
EECs and RQs										
NOAEC			i	Tall Grass Plants/		leaf	Fruits/Pods/			
(mg/kg-diet)	Short G	Grass Tall Grass Plants/								
(mg/kg-uter)					Small I	nsects	Large 1	nsects		
	EEC RQ EEC RQ EEC RQ EEC R							RQ		
100	498.15	498.15 4.98 228.32 2.28 280.21 2.80 31.13 0.31								

Size class not used for dietary risk quotients

	Table C6. U					malian D th 14 Day			Quotient	ts	
EECs and RQs											
Size Class (grams)	Adjusted NOAEL	Short (Short Grass Tall Grass Broadleaf Plants/ Small Insects		s/ Seeds/		Granivores				
		EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ
15	16.04	474.94	29.60	217.68	13.57	267.16	16.65	29.68	1.85	6.60	0.41
35	12.98	328.25	25.29	25.29 150.45 11.59 184.64 14.22 20.52 1.58 4.56					4.56	0.35	
1000	5.61	76.11	13.55	34.88	6.21	42.81	7.62	4.76	0.85	1.06	0.19

Bold values indicate LOC exceedances

Mean EECs and RQs for 4 Applications at 0.75 lb ai/A with a 14-day Interval

	Table C7. Me (4 App	ean Kenaş olications						nts		
			EECs and RQs							
Size Class (grams)	Adjusted LD50	Short Grass Tall Grass Broadles Plants/ Small Inse				ıts/	See La	/Pods/ ds/ rge ects		
		EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ	
20	>1440.86	200.93	N/A	85.10	N/A	106.38	N/A	16.55	N/A	
100	>1834.29	114.58	114.58 N/A 48.53 N/A 60.66 N/A 9.44 N/A							
1000	>2591.00	51.30	N/A	21.73	N/A	27.16	N/A	4.22	N/A	

N/A - Acute toxicity threshold was greater than the highest dose tested; risk is expected to be minimal; thus, RQs were not calculated

Table	e C8. Mea (4 Ap				n Dietary with 14 D			ients		
				EECs a	nd RQs					
	Short Grass Tall Grass					dleaf nts/ Insects	Sec	s/Pods/ eds/ Insects		
LC50	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ		
>4310	176.43									

Size class not used for dietary risk quotients

Table C9.	Mean Ker Applicati							nts	
	EECs and RQs								
NOAEC	Short Grass Tall Grass				Pla Sn	dleaf nts/ nall ects	Sec	s/Pods/ eds/ Insects	
(mg/kg-diet)	EEC	RQ	EEC	RQ	EEC RQ		EEC	RQ	
309	176.43							0.047	

Size class not used for dietary risk quotients Bold value indicates LOC exceedance

	Table C10). Mean K (4 Applic						_	tients		
EECs and RQs											
Size Class (grams)	Adjusted LD50	Chaut Cance Tal		Broadleaf		Plants/		Fruits/Pods/ Seeds/ Large Insects		Granivores	
		EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ
15	1558.26	168.21	0.108	71.24	0.046	89.05	0.057	13.85	0.009	3.08	0.00
35	1260.80	116.26	116.26 0.092 49.24 0.039 61.55 0.049 9.57 0.008 2.13 0.							0.00	
1000	545.33	26.95	0.049	11.42	0.021	14.27	0.026	2.22	0.004	0.49	0.00

	Table C11. Mean Kenaga, Chronic Mammalian Dietary Based Risk Quotients (4 Applications @ 0.75 lb ai/A with 14 Day Intervals)									
EECs and RQs										
NOAEC (mg/kg-diet)	Short	Grass	Tall (Tall Grass		dleaf nts/ iall ects	Se	ts/Pods/ eeds/ e Insects		
	EEC	EC RQ EEC RQ EEC RQ		RQ	EEC	RQ				
100	176.43	1.764	74.72	0.747	93.40	0.934	14.53	0.145		

Size class not used for dietary risk quotients

	Table C12.	Mean Ke (4 Applica						_	otients					
			<u> </u>	-	E	ECs and	l RQs	<u>_</u>	_					
Size Class (grams)	Adjusted NOAEL	Short	Grass	Tall Grass		Broadleaf Plants/ Small Insects		Tall Grass Plants/		Sec La	Fruits/Pods/ Seeds/ Large Insects		Granivores	
		EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ			
15	16.04	168.21	10.484	71.24	4.440	89.05	5.550	13.85	0.863	3.08	0.19			
35	12.98	116.26	116.26 8.956 49.24 3.793 61.55 4.741 9.57 0.738 2.13					0.16						
1000	5.61	26.95	4.801	11.42	2.033	14.27	2.541	2.22	0.395	0.49	0.09			

RESULTS- Upper Bound EECs and RQs for 12 Applications at 0.26 lb ai/A with a 14-day Interval

Upper Bound Kenaga Res	idues For RQ Calculation
Chemical Name:	Flurprimidol
Use:	Turf Grass / Ornamentals
Formulation:	Cutless 50W Turf Growth Regulator
Application Rate:	0.26 lbs ai/A
Half-life:	35 days
Application Interval:	14 days
Maximum # Apps./Year:	12 applications
Length of Simulation:	1 year

Endpoints			
_ _	Bobwhite quail	LD50 (mg/kg-bw)	>2000
Atriam	Bobwhite quail	LC50 (mg/kg-diet)	>4310
Avian	Mailard duck	NOAEL(mg/kg-bw)	0.00
	Mallard duck	NOAEC (mg/kg-diet)	309
		LD50 (mg/kg-bw)	709
Managada		LC50 (mg/kg-diet)	0.00
Mammals		NOAEL (mg/kg-bw)	7.3
		NOAEC (mg/kg-diet)	100

Dietary-Based EECs								
Food Items	Upper Bound EEC (mg ai/kg)	Mean EEC (mg ai/kg)						
Short Grass	248.45	87.99						
Tali Grass	113.87	37.27						
Sm. Insects, Broadleaf Plants	139.75	46.58						
Lg. Insects, Fruits, Pods	15.53	<u>7.</u> 25						

AVIAN EECs and ADJUSTED LD50s

Avian Class	Body Weight (g)	, , i (FORV)		% body wgt consumed	FI (kg-diet/day)
Small	20	5	23	114	2.28E-02
Mid	100	13	65	65	6.49E-02
Large	1000	58	291	29	2.91E-01

Avian Body	Adjusted LD50
Weight (g)	(mg/kg-bw)
20	>1440.86

100	>1834.29
1000	>2591

Dose-based EECs (m	ıg/kg-bw)					
	Avian C	lasses and Body	Weights			
Food items	small	mid	large			
	20 g	100 g	1000 g			
Uppei	Bound EEC (m	g/kg)				
Short Grass	282.96	161.36	72.24			
Tall Grass	129.69	73.95	33.11			
Sm. Insects, Broadleaf Plants	159.16	90.76	40.64			
Lg. Insects, Fruits, Pods	17.68	10.08	4.52			
M	ean EEC (mg/kg)				
Short Grass	100.21	57.15	25.59			
Tall Grass	42.44	24.20	10.84			
Sm. Insects, Broadleaf Plants	53.05	30.25	13.55			
Lg. Insects, Fruits, Pods	8.25	4.71	2.11			

MAMMALIAN EECs and ADJUSTED LD50s

Mammalian Class	Body Weight	Ingestion (Fdry) (g bwt/day)	Ingestion (Fwet) (g/day)	% body wgt consumed	FI (kg-diet/day)
Herbivores/	3	14	95	1.43E-02	
insectivores -	35	5	23	66	2.31E-02
Illactivoles -	1000	31	153	15	1.53E-01
	15	3	3	21	3.18E-03
Granivores	35	5	5	15	5.13E-03
	1000	31	34	3	3.40E-02

Mammalian	Body	Adjusted	Adjusted
Class	Weight	LD50	NOAEL
Herbivores/	15	1558.26	16.04
insectivores	35	1260.80	12.98
	1000	545.33	5.61
	15	1558.26	16.04
Granivores	35	1260.80	12.98
	1000	545.33	5.61

Dose-based EECs		Mamma	Mammalian Classes and Body Weight							
(mg/kg-bw)	Herbivo	res and Ins	ectivores							
(mg/kg 511)	15 g	35 g	1000 g	15 g	35 g	1000 g				
	Upper Bou	nd EECs (r	ng ai/kg)			<u> </u>				
Short Grass	236.88	163.71	37.96							
Tall Grass	108.57	75.04	17.40							
Broadleaf plants and small insects	133.24	92.09	21.35							
Fruits/pods/seeds/large insects	14.80	10.23	2.37	3.29	2.27	0.53				
	Mean B	ECs (mg a	i/kg)							
Short Grass	83.89	57.98	13.44							
Tall Grass	35.53	24.56	5.69							
Broadleaf plants and small insects	44.41	30.70	7.12		_	-				
Fruits/pods/seeds/large insects	6.91	4.77	1.11	1.54	1.06	0.25				

Table C13. Upper Bound Kenaga, Acute Avian Dose-Based Risk Quotients (12 Applications @ 0.26 lb ai/A with 14 Day Intervals)											
EECs and RQs											
Size Class (grams)	Adjusted LD50	Short	Grass	Tall C	rass	Broadleaf Plants/ Small Insects		See	Fruits/Pods/ Seeds/ Large Insects		
		EEC	RQ	EEC	RQ	EEC	·RQ	EEC	RQ		
20	>1440.86	282.96	N/A	129.69	N/A	159.16	N/A	17.68	N/A		
100	>1834.29	161.36	N/A	73.95	N/A	90.76	N/A	10.08	N/A		
1000	>2591.00	72.24	N/A	33.11	N/A	40.64	N/A	4.52	N/A		

⁻Bold value indicates LOC exceedance

⁻N/A - Acute toxicity threshold was greater than the highest dose tested; risk is expected to be minimal; thus, RQs were not calculated

Table C1	14. Upper I (12 Ap				Avian Dieta with 14 Day			otients	
		·		EECs a	nd RQs				
	Short G	Frass	Tall G	rass	Broad Plan Small In	ts/	Fruits/Pods/ Seeds/ Large Insects		
LC50	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ	
>4310	248.45	N/A	113.87	N/A	139.75	N/A	15.53	N/A	

⁻Size class not used for dietary risk quotients

⁻Bold value indicates LOC exceedance

⁻N/A - Acute toxicity threshold was greater than the highest dose tested; risk is expected to be minimal; thus, RQs were not calculated

Table C15. U	pper Boun (12 Applica							tients
				EECs a	and RQs			
NOAEC	Short G	Frass	Tall G	rass	Broad Plant Small In	ts/	Fruits/ See Large I	ds/
(mg/kg-diet)	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ
309	248.45	0.80	113.87	0.37	139.75	0.45	15.53	0.05

Size class not used for dietary risk quotients Bold values indicate LOC exceedances

	Table C16. I	Jpper Boui (12 Appli							uotients			
					E	ECs and	RQs	·				
Size Class (grams)	Adjusted LD50	Short (Grass	Tail C	Grass	Broad Plan Small I	ıts/	Fruits/Pods/ Seeds/ Large Insects		Grani	Granivores	
	<u> </u>	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ	
15	1558.26	236.88	0.15	.108.57	0.07	133.24	0.09	14.80	0.01	3.29	0.00	
35	1260.80	163.71	0.13	75.04	0.06	92.09	0.07	10.23	0.01	2.27	0.00	
1000	545.33	37.96	0.07	17.40	0.03	21.35	0.04	2.37	0.00	0.53	0.00	

	Table C17. Upper Bound Kenaga, Chronic Mammalian Dietary Based Risk Quotients (12 Applications @ 0.26 lb ai/A with 14 Day Intervals)										
				EECs a	nd RQs		-				
NOAEC (mg/kg-diet)	Short (Grass	Tall G	rass	Broad Plan Small I	ts/	Fruits/ See Large I	ds/			
	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ			
100	248.45	2.48	113.87	1.14	139.75	1.40	15.53	0.16			

Size class not used for dietary risk quotients

	Table C18. U					nmalian I ith 14 Day			Quotien 	ts	
Size Class (grams)	Adjusted NOAEL	EECs and RQs									
		Short Grass		Tall Grass		Broadleaf Plants/ Small Insects		Fruits/Pods/ Seeds/ Large Insects		Granivores	
		EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ
15	16.04	236.88	14.76	108.57	6.77	133.24	8.30	14.80	0.92	3.29	0.21
35	12.98	163.71	12.61	75.04	5.78	92.09	7.09	10.23	0.79	2.27	0.18
1000	5.61	37.96	6.76	17.40	3.10	21.35	3.80	2.37	0.42	0.53	0.09

Bold values indicate LOC exceedances

Mean EECs and RQs for 12 Applications at 0.26 lb ai/A with a 14-day Interval

Table C19. Mean Kenaga, Acute Avian Dose-Based Risk Quotients (12 Applications @ 0.26 lb ai/A with 14 Day Intervals)											
	Adjusted LD50	EECs and RQs									
Size Class (grams)		Short Grass		Tall Grass		Broadleaf Plants/ Small Insects		Fruits/Pods/ Seeds/ Large Insects			
		EEC	RQ	EEC	RQ	EEC	RQ	EEC -	RQ		
20_	>1440.86	100.21	N/A	42.44	N/A	53.05	N/A	8.25	N/A		
100	>1834.29	57.15	N/A	24.20	N/A	30.25	N/A	4.71	N/A		
1000	>2591.00	25.59	N/A	10.84	N/A	13.55	N/A	2.11	N/A		

N/A - Acute toxicity threshold was greater than the highest dose tested; risk is expected to be minimal; thus, RQs were not calculated

Table C20. Mean Kenaga, Subacute Avian Dietary Based Risk Quotients (12 Applications @ 0.26 lb ai/A with 14 Day Intervals)											
•	EECs and RQs										
	Short Grass		Tall (Grass	Broadleaf Plants/ Small Insects		Fruits/Pods/ Seeds/ Large Insects				
LC50	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ			
>4310	87.99	N/A	37.27	N/A	46.58	N/A	7.25	N/A			

Size class not used for dietary risk quotients

Table C21. Mean Kenaga, Chronic Avian Dietary Based Risk Quotients (12 Applications @ 0.26 lb ai/A with 14 Day Intervals)											
	EECs and RQs										
NOAEC	Short Grass		Tall Grass		Broadleaf Plants/ Small Insects		Fruits/Pods/ Seeds/ Large Insects				
(mg/kg-diet)	EEC	RQ	EEC	RQ	EEC_	RQ	EEC	RQ			
309	87.99	0.285	37.27	0.121	46.58	0.151	7.25	0.023			

Size class not used for dietary risk quotients Bold value indicates LOC exceedance

	Table C22	2. Mean K (12 Applic							tients		,
	EECs and RQs										
Size Class (grams)	Adjusted LD50	Short	Grass	Tali (Grass	Pia	dleaf nts/ Insects	See La	/Pods/ eds/ rge ects	Gran	ivores
		EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ
15	1558.26	83.89	0.054	35.53	0.023	44.41	0.029	6.91	0.004	1.54	0.00
35	1260.80	57.98	0.046	24.56	0.019	30.70	0.024	4.77	0.004	1.06	0.00
1000	545.33	13.44	0.025	5.69	0.010	7.12	0.013	1.11	0.002	0.25	0.00

Table C23. Me	an Kenag 2 Applica							tients
EECs and RQs								
NOAEC (mg/kg-diet)	Short Grass		Tall Grass		Broadleaf Plants/ Small Insects		Fruits/Pods/ Seeds/ Large Insects	
·	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ
100	87.99	0.880	37.27	0.373	46.58	0.466	7.25	0.072

Size class not used for dietary risk quotients

	Table C24.	Mean Ke 12 Applic			ai/A wit	<u>h 14 Da</u>	y Interv		otients		
EECs and RQs											
Size Class (grams)	Adjusted NOAEL	Short Grass Tal		Tall (Grass	Broadleaf Plants/ Small Insects		Fruits/Pods/ Seeds/ Large Insects		Granivores	
		EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ	EEC	RQ
15	16.04	83.89	5.229	35.53	2.215	44.41	2.768	6.91	0.431	1.54	0.10
35	12.98	57.98	4.467	24.56	1.892	30.70	2.365	4.77	0.368	1.06	0.08
1000	5,61	13.44	2.394	5.69	1.014	7.12	1.268	1.11	0.197	0.25	0.04

RESULTS- Intermediate EECs and LD50/SQ FT for 1 Banded Spray Application at 0.69 lb ai/A

INPUTS - LD50/SQ	INPUTS - LD50/SQ FT Calculations				
Application Rate:	0.69	lbs / acre			
% A.l.:	100.00%				
Avian LD50 (20g):	>1440.86	mg/kg bw			
(100g)	>1834.29				
(1000g)	>2591.00				
Mammalian LD50					
(15g):	1558.26	mg/kg bw			
(35g)	1260.80	•			
(1000g)	545.33				
Row Spacing:	. 0	inches			
Bandwidth:	0	inches			
Unincorporation:	100%				

Broadcast applications			
Liquid		<u> </u>	
Intermediate Cal	culations		
	mg ai/ft2:	7.18	
LD50 ft-2	wgt class (grams)		
	wgt class (grams)		
Avian	20	N/A	
	100	N/A	
	1000	N/A	
Mammal	15	0.31	
	35	0.16	
	1000	0.01	

RESULTS- Intermediate EECs and LD50/SQ FT for 1 Application of Granules at 0.75 lb a.i./A

INPUTS - LD50/SQ	INPUTS – LD50/SQ FT Calculations				
Application Rate:	0.75	lbs/ acre			
% A.l.:	100.00%		Ì		
Avian LD50 (20g):	>1440.86	mg/kg bw			
(100g)	>1834.29		ļ		
(1000g)	>2591.00		ĺ		
Mammalian LD50					
(15g):	1558.26	mg/kg bw	i		
(35g)	1260.80		- 1		
(1000g)	545.33				
Row Spacing:	0	inches	ŀ		
Bandwidth:	0	inches	İ		
Unincorporation:	100%				

Broadcast applications				
Granular				
Intermediate Ca	lculations			
	mg ai/ft2:	7.81		
LD50 ft-2	wgt class (grams)			
Avian	20 100 1000	N/A N/A N/A		
Mammal	15 35	0.33 0.18		
	1000	0.01		

RESULTS- Intermediate EECs and LD50/SQ FT for 1 Application of Granules at 3.0 lb a.i./A

INPUTS - LD50/SQ	NPUTS – LD50/SQ FT Calculations			
Application Rate:	3.0	lbs / acre		
% A.I.:	100.00%			
Avian LD50 (20g):	>1440.86	mg/kg bw		
(100g)	>1834.29			
(1000g)	>2591.00	* * * * * * * * * * * * * * * * * * * *		
Mammalian LD50				
(15g):	1558.26	mg/kg bw		
(35g)	1260.80			
(1000g)	545.33			
Row Spacing:	0	inches		
Bandwidth:	·O	inches		
Unincorporation:	100%			

Broadcast applications					
Granular					
Intermediate Ca	lculations				
	mg ai/ft2:	31.24			
LD50 ft-2	wgt class (grams)				
Avian	20 100 1000	N/A N/A N/A			
Mammal	15 35 1000	1.34 0.71 0.06			

RESULTS- Intermediate EECs and LD50/SQ FT for 1 Banded Application of Granules at 1.5 lb a.i./A

INPUTS - LD50/SQ	INPUTS - LD50/SQ FT Calculations				
Application Rate:	1.5	lbs / acre			
% A.I.:	100.00%				
Avian LD50 (20g):	>1440.86	mg/kg bw			
(100g)	>1834.29				
(1000g)	>2591.00				
Mammalian LD50	1				
(15g):	1558.26	mg/kg bw			
(35g)	1260.80				
(1000g)	545.33				
Row Spacing:	0	inches			
Bandwidth:	0	inches			
Unincorporation:	100%				

Broadcast ap	Broadcast applications			
Granular				
Intermediate Cal	culations			
	mg ai/ft2:	15.62		
LD50 ft-2	wgt class (grams)			
Avian	20 100 1000	N/A N/A N/A		
Mammal	15 35	0.67 0.35		
	1000	0.03		

APPENDIX D: Terrestrial Chronic Exposure Estimates for Granular Applications of Flurprimidol (Earthworm Fugacity Model)

Flurprimidol exposure to terrestrial wildlife from non-granular applications is evaluated by estimating pesticide residues on food items including grasses, plants, insects, fruits, pods, and seeds. For granular applications, terrestrial EECs and acute risks were derived based on an estimation of loadings of pesticide per unit area (ft²). EFED has no standard methodology for assessing chronic risk to terrestrial animals from granular applications. The following chronic exposure estimation and risk characterization for terrestrial animals considers granular routes of exposure including direct ingestion of soil invertebrates that have bioconcentrated pesticide residues of granules in soil.

Direct Ingestion of Soil Invertebrates

An estimation of flurprimidol concentrations potentially accumulated in the tissues of earthworms was required to complete the exposure estimates for insectivorous birds and mammals. This estimation of earthworm concentration was calculated using a fugacity-based (equilibrium partitioning) approach based on the work of Trapp and McFarlane (1995) and Mackay and Paterson (1981). Earthworms dwelling within the soil are exposed to contaminants in both soil pore water and via the ingestion of soil (Belfroid et al. 1994). The concentration of flurprimidol in earthworms was calculated as a combination of uptake from soil pore water and gastrointestinal absorption from ingested soil:

 $C_{\text{earthworm}} = [(C_{\text{soil}})(Z_{\text{earthwonn}}/Z_{\text{soil}})] + [(C_{\text{soil water}})(Z_{\text{earthworm}}/Z_{\text{water}})]$

where:

C_{soil} is the concentration of chemical in bulk soil (note: a chemical concentration averaged over a 15-cm soil depth was used to reflect a concentration across the earthworm occupied area of soil)

 $Z_{\text{earthworm}}$ is the fugacity capacity of chemical in earthworms = $(\text{lipid})(K_{\text{ow}})(\rho_{\text{earthworm}})/H$

 Z_{soil} is the fugacity capacity of chemical in soil = $(K_d)(\rho_{\text{soil}})/H$

 Z_{water} is the fugacity capacity of chemical in water = 1/H

 $C_{\text{soil water}}$ is the concentration of chemical in soil water = $C_{\text{soil}}/K_{\text{bw}}$

 K_{bw} is the bulk soil-to-water partitioning coefficient =

 $(\rho_{soil})(K_d) + \theta + (\epsilon - \theta)(K_{aw})$

 K_{aw} is the air-to-water partitioning coefficient = H/RT

H = Henry's Constant specific to flurprimidol (1.17E-4)

R = universal gas constant, 8.31 Joules-m³/mol-°K

T = temperature °K, assumed to be 298 °K

 K_d = soil partitioning coefficient for flurprimidol (2.8)

 ρ_{soil} = bulk density of soil, assumed to be 1.3 g/cm³

 θ = volumetric fraction of the soil, assumed to be 0.30

 ε = volumetric total porosity of the soil, assumed to 0.50 lipid = fraction of lipid in organism 0.01 (Cobb et al., 1995)

 K_{ow} = the octonal to water partitioning coefficient for flurprimidol (2.96)

Table D.1 summarizes the estimated immediate post-treatment soil concentrations of flurprimidol, assuming 15 cm (3-inch) averaging depth, a soil density of 1.3 g/cm³, and granular application rates of flurprimidol at 3.0 lb ai/A.

Table D.1 - Estimated Soil Concentrations for Flurprimidol (Immediately Post-treatment)			
Application Rate (lb ai/A)	Soil Concentration (mg/kg-soil) ca 15 cm		
3.0	0.00718		

Table D.2 summarizes the model inputs and exposure estimates (i.e., earthworm concentrations in ppm) for insectivorous birds and mammals, based on granular flurprimidol application rate of 3.0 lb ai/A.

Table D.2 - Model Input Parameters and Dietary Exposure Estimates for Avian and Mammalian Receptors (for Soil Concentrations Immediately Post-treatment)			
Parameter	3.0 lb ai/A		
C _s (mg/kg @ 15 cm depth)	0.00718		
Earthworm Concentration (mg/kg) (C _{carthworm})	0.0351		
K _d (cm ³ /g)	2.8		
ρ _{soil} (g/cm ³)	1.3		
ρ _{earthworm} (g/cm ³)	1		
θ (unitless)	0.3		
ε (unitless)	0.5		
K _{aw} (H/RT)	4.7E-08		
$K_{bw}((\rho_{soil} \bullet Kd) + \theta + (\epsilon \cdot \theta)(K_{aw}))$	3.94		

Chronic Risk Characterization for Terrestrial Wildlife

Chronic risks for birds and mammals that consume terrestrial invertebrates as the majority of their diet were estimated based on comparison of the concentration of flurprimidol in earthworm tissue (C_{earthworm}) with chronic toxicity values for birds and mammals. Given that earthworms are likely to be present in the top 6 inches of soil, a 15-cm soil depth was used to reflect a

concentration across the earthworm occupied area of soil to derive the C_{carthworm}. It is important to note that this estimation of risk assumes that 100% of the diet is comprised of terrestrial soil invertebrates.

Insectivorous Birds

Chronic risks for insectivorous birds were estimated by comparing the C_{carthworm} in mg/kg by the avian chronic NOAEC for flurprimidol (309 mg/kg). Estimated earthworm residues for insectivorous avian receptors (0.04 mg/kg) are less than the avian chronic endpoint (309 mg/kg; based on reproductive effects) for granular flurprimidol application of 3.0 lb ai/A. Therefore, chronic risks to insectivorous birds associated with ingestion of terrestrial invertebrates (i.e., earthworms) that have bioaccumulated flurprimidol granules are not expected. However, it is unclear whether other routes of granular flurprimidol exposure (i.e., direct consumption of granules, ingestion of granules that adhere to soil invertebrates, partitioning of dissolved flurprimidol to on-site sources of wildlife drinking water, dermal exposure of granules released to surrounding soil, and on-site puddles) or combined routes of exposure would result in chronic risk concerns for terrestrial-phase amphibians.

Insectivorous Mammals

Chronic risks for insectivorous mammals were estimated by considering both dietary- and dose-related exposures and effects. In the dietary method, risks were estimated by comparing the C_{earthworm} by the mammalian chronic NOAEC for flurprimidol (100 mg/kg; based on reduction in body weight gain). In the dose method, the residue concentration in earthworms was converted to a daily oral dose based on the fraction of body weight consumed as estimated through mammalian allometric relationships. The dose was then compared to the NOAEL (7.3 mg/kg-BW/day) for mammalian receptors.

Based on the dietary method and flurprimidol granular application rates of 3.0 lb ai/A, chronic LOCs are not exceeded for insectivorous mammals because the respective earthworm residue concentrations (0.04 mg/kg) are less than the NOAEC (100 mg/kg). Earthworm residue concentrations derived based on the dose method are first converted to a daily dose by multiplying the dietary C_{earthworm} by the percentage BW consumed for the small mammals (15g = 95% BW). In addition, the NOAEL value (7.3 mg/kg-BW/day) is adjusted to account for the size of the mammals according to the following equation:

 $Adjusted\ NOAEL = NOAEL\ (TW/AW)^{(0.25)}$

where:

TW = body weight of tested animal (350 g rat); and AW = body weight of assessed animal (15 g).

As shown in **Table D.3**, estimated chronic doses for insectivorous mammals, based on the granular application of flurprimidol (3.0 lb ai/A) and adjusted NOAELs for small sized mammals does not exceed chronic LOC with a RQ of <0.1. The results of the assessment indicate that,

when growth effect risks for mammals are assessed on the basis of daily ingested dietary dose, the accumulation of flurprimidol in terrestrial invertebrates may represent, by itself, a biologically significant pathway for exposure. Dose-based RQs are likely to provide more accurate estimates of risk to insectivorous mammals because they are based on earthworm residues that are consumed by a mammal in a given day and adjusted NOAEL values for three sizes of mammals, while the dietary-based RQs use no such adjustments to account for feeding behavior and varying size classes.

Table D.3. Dose-based Chronic RQ for Insectivorous Mammals					
Application Rate Body Weight (g) Dose-adjusted EEC (mg/kg-BW/day) Adjusted NOAEL (mg/kg-BW/day) (mg/kg-BW/day) Chronic RQ ^c					
3.0 lb ai/A	15	0.03	16.04	<0.1	

^{*}Dose-adjusted EEC_w = Dietary EEC_w (ppm) • (%BW consumed/100).

Uncertainties

There are a number of uncertainties associated with the fugacity model used to estimate flurprimidol concentrations in earthworm tissue and subsequent risks to insectivorous terrestrial animals. It may be possible to further refine this assessment with additional information addressing the following uncertainties:

A flurprimidol concentration averaged over a 15-cm soil depth was used to reflect a concentration across the earthworm occupied area of soil. However, it is possible that earthworms may be present at deeper soil depths, resulting in a lower concentration of flurprimidol in bulk soil and earthworm tissue.

The fugacity-based model assumes equilibrium partitioning between bulk soil and soil pore water. In addition, the model assumes a fixed value for soil density, earthworm density, temperature, pore space, organic carbon, and the lipid content of the earthworm. Resulting concentrations of flurprimidol in earthworm tissue may be either under- or over-estimated depending on the soil type, temperature, and size/lipid content of the earthworm, at the time of exposure. This assessment considers only one route of exposure (i.e., ingestion of terrestrial invertebrates that have bioaccumulated flurprimidol from granules in the soil) for insectivorous birds and mammals. In addition, it is assumed that 100% of the diet is comprised of terrestrial soil invertebrates. Given species-specific feeding habits and dietary requirements, this assumption may overestimate risks associated with ingestion of soil invertebrates that have accumulated flurprimidol, especially for terrestrialphase amphibians, which have lower metabolic rates than birds. Other potential routes of exposure including direct ingestion of granules, ingestion of granules that adhere to soil invertebrates, partitioning of dissolved flurprimidol to sources of wildlife drinking water, and dermal exposure of granules released to surrounding soil and puddles) or combined routes of exposure were not considered.

hAdjusted NOAEL = NOAEL (TW/AW)025

Chronic RQ = Dose-adjusted EECw/ Adjusted NOAEL.

^{*}Exceeds chronic risk level of concern (RQ ≥ 1.0).

References

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APPENDIX E: TERRPLANT EECs

1. Spray Application of 0.26 lbs ai/A to Turf grass / Ornamentals

Table E1. Chemical Identity.	
Chemical Name	flurprimidot
PC code	125701
Use	Turf / Ornamental
Application Method	Ground
Application Form	liquid
Solubility in Water (ppm)	130 mg/L

Table E2. Input parameters us	ed to derive EECs.		
Input Parameter	Symbol	Value	Units
Application Rate	A	0.26	lbs ai/A
Incorporation	1	1	none
Runoff Fraction	R	0.05	none
Drift Fraction	D	0.01	none

Table E3. EECs for Flurprimidol. Units in lbs ai/A.		
Description	Equation	EEC
Runoff to dry areas	(A/I)*R	0.013
Runoff to semi-aquatic areas	(A/I)*R*10	0.13
Spray drift	A*D	0.0026
Total for dry areas	((A/I)*R)+(A*D)	0.0156
Total for semi-aquatic areas	((A/I)*R*10)+(A*D)	0.1326

Table E4. Plant survival and growth data used for RQ derivation. Units are in lbs ai/A.				
	Seedling	Emergence	Vegetative Vigo	live Vigor
Plant type	EC25	NOAEC	EC25	NOAEC
Monocot	0.14	0.038	0.42	0.11
Dicot	0.012	0.0044	0.011	0.0046

spray drift.*				
Plant Type	Listed Status	Dry	Semi-Aquatic	Spray Drift
Monocot	non-listed	0.11	0.95	<0.1
Monocot	listed	0.41	3.49	<0.1
Dicot	non-listed	1.30	11.05	0.24
Dicot	listed	3.55	30.14	0.57

2. Spray Application of 0.75 lbs ai/A to Turf / Ornamentals

Table E6. Chemical Identity	·
Chemical Name	flurprimidol
PC code	125701
Use	Turf / Ornamental
Application Method	Ground
Application Form	fiquid
Solubility in Water (ppm)	130 mg/L

Table E7. Input parameters used to derive EECs.				
Input Parameter	Symbol	Value	Units	
Application Rate	Α	0.75	Lbs ai/A	
Incorporation		. 1	none	
Runoff Fraction	R	0.05	none	
Drift Fraction	D D	0.01	none	

Table E8. EECs for Flurprimidol. Units in y.				
Description	Equation	EEC		
Runoff to dry areas	_(A/I)*R	0.0375		
Runoff to semi-aquatic areas	(A/I)*R*10	0.375		
Spray drift	A*D	0.0075		
Total for dry areas	((A/I)*R)+(A*D)	0.045		
Total for semi-aquatic areas	((A/I)*R*10)+(A*D)	0.3825		

Table E9. Plant survival and growth data used for RQ derivation. Units are in Lbs ai/A.				
	Seedling Emergence		Emergence Vegetative	
Plant type	EC25	NOAEC	EC25	NOAEC
Monocot	0.14	0.038	0.42	0.11
Dicot	0.012	0.0044	0.011	0.0046

Table E10. RQ values for plants in dry a	nd semi-aquatic areas	exposed to Flu	rprimidol through
runoff and/or spray drift.*			

Plant Type	Listed Status	Dry	Semi-Aquatic	Spray Drift
Monocot	non-listed	0.32	2.73	<0.1
Monocot	listed	1.18	10.07	0.20
Dicot	non-listed	3.75	31.88	0.68
Dicot	listed	10.23	86.93	1.63

^{*}If RQ > 1.0, the LOC is exceeded, resulting in potential for risk to that plant group. INC - inconclusive

3. Granular Application of 0.75 lbs ai/A to Turf / Ornamentals

Table E11. Chemical Identity	•
Chemical Name	flurprimidol
PC code	125701
Use	Turf / Ornamental
Application Method	Ground
Application Form	Granular
Solubility in Water (mg/L)	130 mg/L

Table E12. Input parameters	used to derive EECs	1.	
Input Parameter	Symbol	Value	Units_
Application Rate	<u>A</u>	0.75	lbs ai/A
Incorporation	1	11	none
Runoff Fraction	R	0.05	none
Drift Fraction	D	0	none

able E13. EECs for Flurprimidol. Units in lbs at/A.		
Description	Equation	EEC
Runoff to dry areas	(A/I)*R	0.0375
Runoff to semi-aquatic areas	(A/I)*R*10	0.375
Spray drift	A*D	0
Total for dry areas	((A/I)*R)+(A*D)	0.0375
Total for semi-aquatic areas	((A/I)*R*10)+(A*D)	0.375

Table E14. Plant survival and growth data used for RQ derivation. Units are in lbs al/A.				
· · · · · · · · · · · · · · · · · · ·	Seedling E	mergence	Vegetat	ive Vigor
Plant type	EC25	NOAEC	EC25	NOAEC
Monocot	0.14	0.038	0.42	0.11
Dicot	0.012	0.0044	0.011	0.0046

off and/or spray drift.*		***		
Plant Type	Listed Status	Dry	Semi-Aquatic	Spray Drift
Monocot	non-listed	0.27	2.68	<0.1
Monocot	listed	0.99	9.87	<0.1
Dicot	non-listed	3.1 <u>3</u>	31.25	<0.1
Dicot	listed	8.52	85.23	<0.1

4. Granular Application of 1.5 lbs ai/A to Turf / Ornamentals

Table E16. Chemical Identity	
Chemical Name	flurprimidol
PC code	125701
Use	Turf / Ornamental
Application Method	Ground
Application Form	Granular
Solubility in Water (mg/L)	130 mg/L

Table E17. Input parameters	used to derive EECs).	
Input Parameter	Symbol	Value	Units
Application Rate	A	1.5	lbs ai/A
Incorporation		1	none
Runoff Fraction	R	0.05	none
Drift Fraction	D	0	none

able E18. EECs for Flurprimidol. Units in lbs ai/A.		
Description	Equation	EEC
Runoff to dry areas	(A/I)*R	0.075
Runoff to semi-aquatic areas	(A/I)*R*10	0.75
Spray drift	A*D	0
Total for dry areas	((A/I)*R)+(A*D)	0.075
Total for semi-aquatic areas	((A/I)*R*10)+(A*D)	0.75

Table E19. Plant survival and growth data used for RQ derivation. Units are in lbs ai/A.				
	Seedling	Emergence	Vegetat	ive Vigor
Plant type	EC25	NOAEC	EC25	NOAEC
Monocot	0.14	0.038	0.42	0.11
Dicot	0.012	0.0044	0.011	0.0046

spray drift.*				
Plant Type	Listed Status	Dry	Semi-Aquatic	Spray Drift
Monocot	non-listed	0.54	5.36	<0.1
Monocot	listed	1.97	19.74	<0.1
Dicot	non-listed	6.25	62.50	<0.1
Dicot	listed	17.05	170.45	<0.1

5. Granular Application of 3.0 lbs ai/A to Turf / Ornamentals

Table E21. Chemical Identity.		
Chemical Name	flurprimidol	
PC code	125701	
Use	Turf / Ornamental	
Application Method	Ground	
Application Form	Granular	
Solubility in Water (mg/L)	130 mg/L	

Table E22. Input parameters	used to derive EECs).	
Input Parameter	Symbol	Value	Units
Application Rate	Α	3.0	lbs ai/A
Incorporation		1	none
Runoff Fraction	R	0.05	none
Drift Fraction	D	0	none

Table E23. EECs for Flurprimidol. Units in	lbs ai/A.	
Description	Equation	EEC
Runoff to dry areas	(A/I)*R	0.15
Runoff to semi-aquatic areas	(A/I)*R*10	1.5
Spray drift	A*D	0
Total for dry areas	((A/I)*R)+(A*D)	0.15
Total for semi-aquatic areas	((A/I)*R*10)+(A*D)	1.5

Table E24. Plant survival and growth data used for RQ derivation. Units are in lbs ai/A.					
	Seedling I	Emergence	Vegetat	ive Vigor	
Plant type	EC25	NOAEC	EC25	NOAEC	
Monocot	0.14	0.038	0.42	0.11	
Dicot .	0.012	0.0044	0.011	0.0046	

Plant Type	Listed Status	Drv	Semi-Aquatic	Spray Drift
Monocot	non-listed	1.07	10.71	<0.1
Monocot	listed	3.95	39.47	<0.1
Dicot	non-listed	12.50	125.00	<0.1
Dicot	listed	34.09	340.91	<0.1

APPENDIX F: LOCATES - Direct Effect Co-occurrence Analysis

Species Occurrence in Selected States and Selected Taxa

No species were excluded All Medium Types Reported

Mammal, Bird, Amphibian, Reptile, Dicot, Monocot, Ferns, Conf/cycds, Lichen AL, AK, AZ, AR, CA, CO, CT, DE, DC, FL, GA, HI, ID, IL, IN, IA, KS, KY, LA, ME, MD, MA, MI, MN, MS, MO, MT, NE, NV, NH, NJ, NM, NY, NC, ND, OH, OK, OR, PA, PR, RI, SC, SD, TN, TX, UT, VT, VA, WA, WV, WI, WY

(33) species:			<u>СН</u>
		•	
Ambystoma cingulatum	Threatened	Freshwater, Vernal pool, Terrestrial	No
Phaeognathus hubrichti	Threatened	Freshwater, Terrestrial	No
Charadrius melodus	Endangered	Terrestrial	Yes
Mycteria americana	Endangered	Terrestrial	No
Picoides borealis	Endangered	Terrestrial	No
Amphianthus pusillus	Threatened	Freshwater	No
Marshallia mohrii	Threatened	Terrestrial	No
Lesquerella lyrata	Threatened	Terrestrial	No
Dalea foliosa	Endangered	Terrestrial	No
Pülimnium nodosum	Endangered	Freshwater	No
Clematis socialis	Endangered	Terrestrial	No
Clematis morefieldii	Endangered	Terrestrial	Nο
ke Sarracenia rubra alabamensis	Endangered	Freshwater, Terrestrial	No
Sarracenia oreophila	Endangered,	Terrestrial, Freshwater	No
Apios priceana	Threatened	Terrestria!	No
Thelypteris pilosa var. alabamensis	Threatened	Terrestrial	No
Asplenium scolopendrium var. americanum	Threatened	Terrestrial	No
Isoetes louisianensis	Endangered	Freshwater, Terrestrial	No
Myotis grisescens	Endangered	Subterraneous, Terrestrial	No
Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Peromyscus polionotus ammobates	Endangered	Terrestrial, Coastal (neritic)	Yes
	Ambystoma cingulatum Phaeognathus hubrichti Charadrius melodus Mycteria americana Picoides borealis Amphianthus pusillus Marshallia mohrii Lesquerella lyrata Dalea foliosa Ptilimnium nodosum Clematis socialis Clematis morefieldii Sarracenia rubra alabamensis Sarracenia oreophila Apios priceana Thelypteris pilosa var. alabamensis Asplenium scolopendrium var. americanum Isoetes louisianensis Myotis grisescens Myotis sodalis	Ambystoma cingulatum Phaeognathus hubrichti Charadrius melodus Mycteria americana Picoides borealis Endangered Picoides borealis Endangered Amphianthus pusillus Marshallia mohrii Threatened Lesquerella lyrata Dalea foliosa Ptilimnium nodosum Endangered Pilimnium nodosum Endangered Clematis socialis Endangered Clematis morefieldii Endangered Sarracenia rubra alabamensis Endangered Sarracenia oreophila Apios priceana Threatened Thelypteris pilosa var. alabamensis Asplenium scolopendrium var. americanum Isoetes louisianensis Endangered Myotis grisescens Endangered Endangered Endangered	Ambystoma cingulatum Threatened Phaeognathus hubrichti Threatened Preshwater, Terrestrial Charadrius melodus Endangered Terrestrial Mycteria americana Picoides borealis Amphianthus pusillus Threatened Marshallia mohrii Threatened Terrestrial Lesquerella lyrata Dalea foliosa Pitilimnium nodosum Clematis socialis Endangered Terrestrial Endangered Terrestrial Preshwater Terrestrial Preshwater Threatened Terrestrial Preshwater Terrestrial Preshwater Terrestrial Preshwater Terrestrial Preshwater Clematis morefieldii Endangered Terrestrial Endangered Terrestrial Freshwater, Terrestrial Freshwater, Terrestrial Freshwater Threatened Terrestrial Freshwater, Terrestrial Findangered Terrestrial Freshwater Threatened Terrestrial Freshwater Threatened Terrestrial Terrestrial Threatened Terrestrial Threatened Terrestrial

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Mouse, Perdido Key Beach	Peromyscus polionotus trissyllepsis	Endangered	Coastal (neritic)	Yes
Monocot				
Grass, Tennessee Yellow-eyed	Xyris tennesseensis	Endangered	Terrestrial	No
Trillium, Relict	Trillium reliquum	Endangered	Terrestrial	No
Water-plantain, Kral's Reptile	Sagittaria secundifolia	Threatened	Freshwater	No
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtle, Kemp's ridley	Lepidochelys kempii	Endangered	Saltwater	No
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
Sea turtle, loggerhead	Caretta caretta	Threatened	Saltwater	No
Snake, Eastern Indigo	Drymarchon corais couperi	Threatened	Terrestrial	No
Tortoise, Gopher	Gopherus polyphemus	Threatened	Terrestrial	No
Turtle, Alabama Red-bellied	Pseudemys alabamensis	Endangered [*]	Terrestrial, Freshwater	No
Turtle, Flattened Musk	Sternotherus depressus	Threatened	Freshwater, Terrestrial	No
Alaska (5) species:			<u>CH</u>
Bird				
Curlew, Eskimo	Numenius borealis	Endangered '	Terrestria!	No
Eider, Spectacled	Somateria fischeri	Threatened	Saltwater, Terrestrial	Yes
Eider, Steller's	Polysticta stelleri	Threatened	Terrestrial, Saltwater	Yes
Ferns ·				
Fern, Aleutian Shield	Polystichum aleuticum	Endangered	Terrestrial	No
Reptile			•	
Sea turtie, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
Arizona (3	8) species:			<u>сн</u>
Amphibian				
Frog, Chiricahua Leopard	Rana chiricahuensis	Threatened	Freshwater, Terrestrial	No
Salamander, Sonora Tiger	Ambystoma tigrinum stebbinsi	Endangered	Vernal pool, Freshwater, Terrestrial	No
Bird				
Bobwhite, Masked	Colinus virginianus ridgwayi	Endangered	Terrestrial	No.
Condor, California	Gymnogyps californianus	Endangered	Terrestrial	Yes
Eagle, Bald	Haliaeetus leucocephalus	Threatened	Terrestrial	No
Falcon, Northern Aplomado	Falco femoralis septentrionalis	Endangered	Terrestrial	No
Flycatcher, Southwestern Willow	Empidonax traillii extimus	Endangered	Terrestrial	Yes
Owl, Mexican Spotted	Strix occidentalis lucida	Threatened	Terrestrial	Yes
Pygmy-owl, Cactus Ferruginous	Glaucidium brasilianum cactorum	Endangered	Terrestrial	No
Rail, Yuma Clapper	Rallus longirostris yumanensis	Endangered	Terrestrial	No

Dicot

Dicor				
Blue-star, Kearney's	Amsonia kearneyana	Endangered	Terrestrial	No
Cactus, Arizona Hedgehog	Echinocereus triglochidiatus var. arizonicus	Endangered	Terrestrial	No
Cactus, Brady Pincushion	Pediocactus bradyi	Endangered	Terrestrial	No
Cactus, Cochise Pincushion	Coryphantha robbinsorum	Threatened	Terrestrial	No
Cactus, Nichol's Turk's Head	Echinocactus horizonthalonius var. nicholii	Endangered	Terrestrial	No
Cactus, Peebles Navajo	Pediocactus peeblesianus peeblesianus	Endangered	Terrestrial	No ·
Cactus, Pima Pineapple	Coryphantha scheeri var. robustispina	Endangered	Terrestrial	No
Cactus, Siler Pincushion	Pediocactus (=Echinocactus,=Utahia) sileri	Threatened	Terrestrial	No
Cliffrose, Arizona	Purshia (=cowania) subintegra	Endangered	Terrestrial	No
Cycladenia, Jones	Cycladenia jonesii (=humilis)	Threatened	Terrestrial	No
Fleabane, Zuni	Erigeron rhizomatus	Threatened	Terrestrial	No
Groundsel, San Francisco Peaks.	Senecio franciscanus	Threatened	Terrestrial	Yes
Milk-vetch, Holmgren	Astragalus holmgreniorum	Endangered	Terrestrial	No
Milk-vetch, Sentry	Astragalus cremnophylax var. cremnophylax	Endangered	Terrestrial ,	No
Milkweed, Welsh's	Asclepias welshii	Threatened	Terrestrial	Yes
Umbel, Huachuca Water Mammal	Lilaeopsis schaffneriana var. recurva	Endangered	Terrestrial, Freshwater	Yes
Bat, Lesser (=Sanborn's) Long-nosed	Leptonycteris curasoae yerbabuenae	Endangered	Subterraneous, Terrestrial	No
Ferret, Black-footed	Mustela nigripes	Endangered	Terrestrial	No
Jaguar	Panthera onca	Endangered	Terrestrial	No
Jaguarundi, Sinaloan	Herpailurus (=Felis) yagouaroundi tolteca	Endangered	Terrestrial	No
Ocelot	Leopardus (=Felis) pardalis	Endangered	Terrestrial	No
Pronghorn, Sonoran .	Antilocapra americana sonoriensis	Endangered	Terrestrial	No
Squirrel, Mount Graham Red	Tamiasciurus hudsonicus grahamensis	Endangered	Terrestrial	Yes
Vole, Hualapai Mexican Monocot	Microtus mexicanus hualpaiensis	Endangered	Terrestrial	No
Ladies'-tresses, Canelo Hills	Spiranthes delitescens	Endangered	Terrestrial	No
Sedge, Navajo	Carex specuicola	Threatened	Terrestrial	Yes
Reptile				
Rattlesnake, New Mexican Ridge-nosed	d Crotalus willardi obscurus	Threatened	Terrestrial	Yes
Tortoise, Desert	Gopherus agassizii	Threatened	Terrestrial	Yes
			_	

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				•	
Arkansas Bird	(9) 8	species:			<u>CH</u>
Tern, Interior (population) Least		Sterna antillarum	Endangered	Terrestrial	No
Woodpecker, Red-cockaded Dicot		Picoides borealis	Endangered	Terrestrial	No
Bladderpod, Missouri		Lesquerella filiformis	Threatened	Terrestria!	No
Fruit, Earth (=geocarpon)		Geocarpon minimum	Threatened	Terrestrial	No
Harperella		Ptilimnium nodosum	Endangered	Freshwater	No
Pondberry		Lindera melissifolia	Endangered	Terrestrial	No
Mammal		•			
Bat, Gray		Myotis grisescens	Endangered	Subterraneous, Terrestrial	No
Bat, Indiana		Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Bat, Ozark Big-eared		Corynorhinus (=Plecotus) townsendii ingens	Endangered	Terrestrial, Subterraneous	s No
California	(232) species:			<u>CH</u>
Amphiblan					
Frog, California Red-legged		Rana aurora draytonii	Threatened	Terrestrial, Freshwater	Yes
Frog, Mountain Yellow-legged		Gopherus agassizii	Endangered	Terrestrial, Freshwater	No
Salamander, California Tiger		Ambystoma californiense	Endangered	Terrestrial, Vernal pool	No
Salamander, Desert Slender		Batrachoseps aridus	Endangered	Freshwater, Terrestrial	No
Salamander, Santa Cruz Long-to	oed	Ambystoma macrodactylum	Endangered	Freshwater, Vernal pool, Terrestrial	No
Toad, Arroyo Southwestern Bird		Bufo californicus (=microscaphus)	Endangered	Freshwater, Terrestrial	Yes
Condor, California		Gymnogyps californianus	Endangered	Terrestrial	Yes
Flycatcher, Southwestern Willow	,	Empidonax traillii extimus	Endangered	Terrestrial	Yes
Gnatcatcher, Coastal California		Polioptila californica californica	Threatened	Terrestrial	Yes
Murrelet, Marbled		Brachyramphus marmoratus marmoratus	Threatened	Freshwater, Terrestrial, Saltwater	Yes
Owl, Northern Spotted		Strix occidentalis caurina	Threatened	Terrestrial	Yes
Plover, Western Snowy		Charadrius alexandrinus nivosus	Threatened	Terrestrial	Yes
Rail, California Clapper		Rallus longirostris obsoletus	Endangered	Terrestrial	No
Rail, Light-footed Clapper		Rallus longirostris levipes	Endangered	Terrestrial	No
Rail, Yuma Clapper		Rallus longirostris yumanensis	Endangered	Terrestrial	No
Shrike, San Clemente Loggerhea	ad	Lanius ludovicianus meamsi	Endangered	Terrestrial	Nο
Sparrow, San Clemente Sage		Amphispiza belli clementeae	Threatened	Terrestrial	No
Tern, California Least		Sterna antillarum browni	Endangered *	Terrestrial	No

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	Towhee, Inyo Brown	Pipilo crissalis eremophilus	Threatened	Terrestrial	Yes
	Vireo, Least Bell's	Vireo bellii pusillus		Terrestrial	
	Conf/cycds	vieo beini pusnius	Endangered	i errestriai	Yes
	Cypress, Gowen	Cupressus goveniana ssp. goveniana	Threatened	Terrestrial	No
	Cypress, Santa Cruz Dicot	Cupressus abramsiana	Endangered	Terrestrial	No
	Adobe Sunburst, San Joaquin	Pseudobahia peirsonii	Threatened	Terrestrial	No
	Allocarya, Calistoga	Plagiobothrys strictus	Endangered	Vernal pool	No
	Ambrosia, San Diego	Ambrosia pumila	Endangered	Terrestrial	No
	Baccharis, Encinitas	Baccharis vanessae	Threatened	Terrestrial	No
	Barberry, Island	Berberis pinnata ssp. insularis	Endangered	Terrestrial	No
	Barberry, Nevin's	Berberis nevinii	Endangered	Terrestrial	No
	Bedstraw, El Dorado	Galium californicum ssp. sierrąe	Endangered	Terrestrial	No
	Bedstraw, Island	Galium buxifolium	Endangered	Terrestrial	No
	Bird's-beak, Palmate-bracted	Cordylanthus palmatus	Endangered	Terrestrial	No
	Bird's-beak, Pennell's	Cordylanthus tenuis ssp. capillaris	Endangered	Terrestrial ·	No
	Bird's-beak, salt marsh	Cordylanthus maritimus ssp. maritimus	Endangered	Saltwater	No
	Bird's-beak, Soft	Cordylanthus mollis ssp. mollis	Endangered	Brackish, Saltwater	No
	Bladderpod, San Bernardino Mountains	Lesquerella kingli ssp. bernardina	Endangered	Terrestrial	Yes
	Bluecurls, Hidden Lake	Trichostema austromontanum ssp. compactum	Threatened	Terrestrial	No
	Broom, San Clemente Island	Lotus dendroideus ssp. traskiae	Endangered	Terrestrial	No
	Buckwheat, Cushenbury	Eriogonum ovalifolium var. vineum	Endangered	Terrestrial	Yes
	Buckwheat, Ione (incl. Irish Hill)	Eriogonum apricum (incl. var. prostratum)	Endangered	Terrestrial	No
	Buckwheat, Southern Mountain Wild	Eriogonum kennedyi var. austromontanum	Threatened	Terrestrial	Nο
	Bush-mallow, San Clemente Island	Malacothamnus clementinus	Endangered	Terrestrial	No
	Bush-mallow, Santa Cruz Island	Malacothamnus fasciculatus var. nasioticus	Endangered	Terrestria!	No
	Butterweed, Layne's	Senecio layneae	Threatened	Terrestrial	Nο
	Button-celery, San Diego	Eryngium aristulatum var. parishii	Endangered	Terrestrial	No
	Cactus, Bakersfield	Opuntia treleasei	Endangered	Terrestrial	Nο
	Ceanothus, Coyote	Ceanothus ferrisae	Endangered	Terrestriai	No
	Čeanothus, Pine Hill	Ceanothus roderickii	Endangered	Terrestrial	No
	Ceanothus, Vaii Lake	Ceanothus ophiochilus	Threatened	Terrestrial	No
	Centaury, Spring-loving	Centaurium namophilum	Threatened	Terrestrial	Yes
	Checker-mallow, Keck's	Sidalcea keckii	Endangered	Terrestrial	Yes
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(Checker-mallow, Kenwood Marsh	Sidalcea oregana ssp. valida	Endangered	Terrestrial	No
(Checker-mallow, Pedate	Sidalcea pedata	Endangered	Terrestrial	No
(Clarkia, Pismo	Clarkia speciosa ssp. immaculata	Endangered	Terrestrial	No
(Clarkia, Presidio	Clarkia franciscana	Endangered	Terrestrial	No
(Clarkia, Springville	Clarkia springvillensis	Threatened	Terrestrial	No
(Clarkia, Vine Hill	Clarkia imbricata	Endangered	Terrestrial	No
(Clover, Fleshy Owl's	Castilleja campestris ssp.	Threatened	Vernal pool	Yes
(Clover, Monterey	Trifolium trichocalyx	Endangered	Terrestrial	No
(Clover, Showy Indian	Trifolium amoenum	Endangered	Terrestrial	No
(Coyote-thistle, Loch Lomond	Eryngium constancei	Endangered	Terrestrial	No
(Crownbeard, Big-leaved	Verbesina dissita	Threatened	Terrestrial	No
(Crownscale, San Jacinto Valley	Atriplex coronata var. notatior	Endangered	Terrestrial	No
[Daisy, Parish's	Erigeron parishii	Threatened	Freshwater	Yes
[Dudleya, Conejo	Dudleya abramsii ssp. parva	Threatened	Terrestrial	No
0	Oudleya, Marcescent	Dudleya cymosa ssp. marcescens	Threatened	Terrestrial	No
[Dudleya, Santa Clara Valley	Dudleya setchellii	Endangered	Terrestrial	No
	Dudleya, Santa Cruz Island	Dudleya nesiotica	Threatened	Terrestrial	No
I	Dudieya, Santa Monica Mountains	Dudleya cymosa ssp. ovatifolia	Threatened	Terrestrial	No
0	Dudleya, Verity's	Dudleya verityi	Threatened	Terrestrial	No
E	Dwarf-flax, Marin	Hesperolinon congestum	Threatened	Terrestrial	No
E	Evening-primrose, Antioch Dunes	Oenothera deltoides ssp. howellii	Endangered	Terrestrial	Yes
£	Evening-primrose, Eureka Valley	Oenothera avita ssp. eurekensis	Endangered	Terrestrial	No
E	Evening-primrose, San Benito	Camissonia benitensis	Threatened	Terrestrial	No
F	iddleneck, Large-flowered	Amsinckia grandiflora	Endangered	Terrestrial	Yes
F	fannelbush, Mexican	Fremontodendron mexicanum	Endangered	Terrestrial	No
F	Flannelbush, Pine Hill	Fremontodendron californicum ssp. decumbens	Endangered	Terrestrial	No
F	ringepod, Santa Cruz Island	Thysanocarpus conchuliferus	Endangered	Terrestrial	No
G	Bilia, Hoffmann's Slender-flowered	Gilia tenuiflora ssp. hoffmannii	Endangered	Terrestrial	No
C	Bilia, Monterey	Gilia tenuiflora ssp. arenaria	Endangered	Terrestrial	No
6	Golden Sunburst, Hartweg's	Pseudobahia bahiifolia	Endangered	Terrestrial	No
C	Soldfields, Burke's	Lasthenia burkei	Endangered	Terrestrial	No
C	Soldfields, Contra Costa	Lasthenia conjugens	Éndangered	Terrestrial	Yes
(Brass, Hairy Orcutt	Orcuttia pilosa	Endangered	Vernal pool	Yes
C	Grass, Sacramento Orcutt	Orcuttia viscida	Endangered	Vernal pool	Yes
(Grass, Slender Orcutt	Orcuttia tenuis	Threatened	Vernal pool	Yes
Ġ	Sumplant, Ash Meadows	Grindelia fraxino-pratensis	Threatened	Terrestrial	Yes

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Ivesia, Ash Meadows	Ivesia kingii var. eremica	Threatened	Terrestrial	Yes
Jewelflower, California	Caulanthus californicus	Endangered	Terrestrial	No
Jewelflower, Metcalf Canyon	Streptanthus albidus ssp. albidus	Endangered	Terrestrial	No
Jewelflower, Tiburon	Streptanthus niger .	Endangered	Terrestrial	No
Larkspur, Baker's	Delphinium bakeri	Endangered	Terrestrial	Yes
Larkspur, San Clemente Island	Delphinium variegatum ssp. kinkiense	Endangered	Terrestrial	No
Larkspur, Yellow	Delphinium luteum	Endangered	Terrestrial	Yes
Layia, Beach	Layia carnosa	Endangered	Terrestrial, Coastal (neritic)	No
Lessingia, San Francisco	Lessingia germanorum (=L.g. var. germanorum)	Endangered	Terrestrial	No
Liveforever, Laguna Beach	Dudleya stolonifera	Threatened	Terrestrial	No
Liveforever, Santa Barbara Island	Dudleya traskiae	Endangered	Terrestrial	Nσ
Lupine, Clover	Lupinus tidestromii	Endangered	Coastal (neritic)	No
Lupine, Nipomo Mesa	Lupinus nipomensis	Endangered	Coastal (neritic)	No
Malacothrix, Island	Malacothrix squalida	Endangered	Terrestrial	No
Malacothrix, Santa Cruz Island	Malacothrix indecora	Endangered	Terrestrial	No
Mailow, Kern	Eremalche kernensis	Endangered	Terrestrial	No
Manzanita, Del Mar	Arctostaphylos glandulosa ssp. crassifolia	Endangered	Terrestrial	No
Manzanita, Ione	Arctostaphylos myrtifolia	Threatened	Terrestrial	No
Manzanita, Morro	Arctostaphylos morroensis	Threatened	Terrestrial	No
Manzanita, Pallid	Arctostaphylos pallida	Threatened	Terrestrial	No
Manzanita, Presidio (=Raven's)	Arctostaphylos hookeri var. ravenii	Endangered	Terrestrial	No
Manzanita, Santa Rosa Island	Arctostaphylos confertiflora	Endangered	Terrestrial	No
Meadowfoam, Butte County	Limnanthes floccosa ssp.	Endangered	Vernal pool	Yes
Meadowfoam, Sebastopol	Limnanthes vinculans	Endangered	Freshwater, Terrestrial	No
Milk-vetch, Braunton's	Astragalus brauntonii	Endangered	Terrestrial	No
Milk-vetch, Clara Hunt's	Astragalus clarianus	Endangered	Terrestrial	No
Milk-vetch, Coachella Valley	Astragalus lentiginosus var. coachellae	Endangered	Terrestria)	Yes
Milk-vetch, Coastal Dunes	Astragalus tener var. titi	Endangered	Terrestrial	No
Milk-vetch, Cushenbury	Astragalus albens	Endangered	Terrestrial	Yes
Milk-vetch, Fish Slough	Astragalus lentiginosus var. piscinensis	Threatened	Terrestrial	No
Milk-vetch, Lane Mountain	Astragalus jaegerianus	Endangered	Terrestrial	Yes
Milk-vetch, Pierson's	Astragalus magdalenae var.	Threatened	Terrestrial	Yes
Milk-vetch, Triple-ribbed	Astragalus tricarinatus	Endangered	Terrestria!	No
Milk-vetch, Ventura Marsh	Astragalus pycnostachyus var. Ianosissimus	Endangered	Terrestrial, Freshwater	Yes

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Mint, Otay Mesa	Pogogyne nudiuscula	Endangered	Terrestrial	No
Mint, San Diego Mesa	Pogogyne abramsii	Endangered	Terrestrial	No
Monardella, Willowy	Monardella linoides ssp. viminea	Endangered	Terrestrial	No
Morning-glory, Stebbins	Calystegia stebbinsii	Endangered	Terrestrial	No
Mountainbalm, Indian Knob	Eriodictyon altissimum	Endangered	Terrestrial	No
Mountain-mahogany, Catalina Island	Cercocarpus traskiae	Endangered	Terrestrial	No
Mustard, Slender-petaled	Thelypodium stenopetalum	Endangered	Terrestrial	No
Navarretia, Few-flowered	Navarretia leucocephala ssp. pauciflora (=N. pauciflora)	Endangered	Vernal pool, Terrestrial	No
Navarretia, Many-flowered	Navarretia leucocephala ssp. plieantha	Endangered	Terrestrial, Vernal pool	No
Navarretia, Spreading	Navarretia fossalis	Threatened	Vernal pool	No
Niterwort, Amargosa	Nitrophila mohavensis	Endangered	Terrestrial	Yes
Oxytheca, Cushenbury	Oxytheca parishii var. goodmaniana	Endangered	Terrestrial	Yes
Paintbrush, Ash-grey Indian	Castilleja cinerea .	Threatened	Terrestrial	No
Paintbrush, San Clemente Island Indian	Castilleja grisea	Endangered	Terrestrial	No
Paintbrush, Soft-leaved	Castilleja mollis	Endangered	Terrestrial	No
Paintbrush, Tiburon	Castilleja affinis ssp. neglecta	Endangered	Terrestrial	No
Penny-cress, Kneeland Prairie	Thlaspi californicum	Endangered	Terrestrial	Yes
Pentachaeta, Lyon's	Pentachaeta Iyonii	Endangered	Terrestrial	No
Pentachaeta, White-rayed	Pentachaeta bellidiflora	Endangered	Terrestrial	No
Phacelia, Island	Phacelia insularis ssp. insularis	Endangered	Terrestrial	No
Phiox, Yreka	Phlox hirsuta	Endangered	Terrestriai	No
Polygonum, Scott's Valley	Polygonum hickmanii	Endangered	Terrestrial	Yes
Potentilla, Hickman's	Potentilla hickmanii	Endangered	Terrestrial	No
Pussypaws, Mariposa	Calyptridium pulchellum	Threatened	Terrestrial	No
Rock-cress, Hoffmann's	Arabis hoffmannii	Endangered ¹	Terrestrial	Nο
Rock-cress, McDonald's	Arabis mcdonaldiana	Endangered	Terrestrial	No
Rock-cress, Santa Cruz Island	Sibara filifolia	Endangered	Terrestrial •	No
Rush-rose, Island	Helianthemum greenei	Threatened	Terrestrial	No
Sandwort, Bear Valley	Arenaria ursina	Threatened	Terrestrial	Nο
Sandwort; Marsh	Arenaria paludicola	Endangered	Freshwater, Terrestrial	No
Sea-blite, California	Suaeda californica	Endangered	Terrestrial	No
Spineflower, Ben Lomond	Chorizanthe pungens var. hartwegiana	Endangered	Terrestrial	No
Spineflower, Howell's	Chorizanthe howellii	Endangered	Terrestrial	No
Spineflower, Monterey	Chorizanthe pungens var. pungens	Threatened	Terrestrial	Yes
Spineflower, Orcutt's	Chorizanthe orcultiana	Endangered	Terrestrial	No

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Spineflower, Robust	Chorizanthe robusta var. robusta	Endangered	Terrestrial	Yes
Spineflower, Scotts Valley	Chorizanthe robusta var. hartwegii	Endangered	Terrestriai	Yes
Spineflower, Slender-homed	Dodecahema leptoceras	Endangered	Terrestrial	No
Spineflower, Sonoma	Chorizanthe valida	Endangered	Terrestrial	No
Spurge, Hoover's	Chamaesyce hooveri	Threatened	Vernal pool	Yes
Stickyseed, Baker's	Blennosperma bakeri	Endangered	Vernal pool	No
Stonecrop, Lake County	Parvisedum leiocarpum	Endangered	Vernal pool	Nο
Sunflower, San Mateo Woolly	Eriophyllum latilobum	Endangered	Terrestrial	No
Taraxacum, California	Taraxacum californicum	Endangered	Terrestrial	No
Tarplant, Gaviota	Deinandra increscens ssp. villosa	Endangered	Terrestrial	Yes
Tarplant, Otay	Deinandra (=Hemizonia) conjugens	Threatened	Terrestrial	Yes
Tarplant, Santa Cruz	Holocarpha macradenia	Threatened	Terrestrial	Yes
Thistle, Chorro creek Bog	Cirsium fontinale var. obispoense	Endangered	Terrestrial, Freshwater	No
Thistle, Fountain	Cirsium fontinale var. fontinale	Endangered	Terrestrial	Nο
Thistle, La Graciosa	Cirsium Ioncholepis	Endangered	Coastal (neritic), Freshwater, Saltwater, Brackish	Yes
Thistle, Suisun	Cirsium hydrophilum var. hydrophilum	Endangered	Brackish, Terrestrial	No
Thornmint, San Diego	Acanthomintha ilicifolia	Threatened	Terrestrial	No
Thornmint, San Mateo	Acanthomintha obovata ssp. duttonii	Endangered	Terrestrial	No
Tuctoria, Green's	Tuctoria greenei	Endangered	Vernal pool	Yes
Vervain, California	Verbena californica	Threatened	Terrestrial	No
Wallflower, Ben Lomond	Erysimum teretifolium	Endangered	Terrestria!	No
Wallflower, Contra Costa	Erysimum capitatum var.	Endangered	Terrestrial	Yes
Wallflower, Menzie's	Erysimum menziesii	Endangered	Terrestrial	No
Watercress, Gambel's	Rorippa gambellii	Endangered	Terrestrial, Brackish, Freshwater	No
Woodland-star, San Clemente Island	Lithophragma maximum	Endangered	Terrestrial	No
Woolly-star, Santa Ana River	Eriastrum densifolium ssp. sanctorum	Endangered	Terrestrial	No
Woolly-threads, San Joaquin	Monolopia (⇒Lembertia) congdonii	Endangered	Terrestrial	No
Yerba Santa, Lompoc	Eriodictyon capitatum	Endangered	Terrestrial	Yes
Mammal				
Fox, San Joaquin Kit	Vulpes macrotis mutica	Endangered	Terrestrial	No
Fox, San Miguel Island	Urocyon littoralis littoralis	Endangered	Terrestrial	Yes
Fox, Santa Catalina Island	Urocyon littoralis catalinae	Endangered	Terrestrial	Yes
Fox, Santa Cruz Island	Urocyon littoralis santacruzae	Endangered	Terrestrial	Yes
Fox, Santa Rosa Island	Urocyon littoralis santarosae	Endangered	Terrestrial	Yes

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Kangaroo Rat, Fresno	Dipodomys nitratoides exilis	Endangered	Terrestrial	Yes
Kangaroo Rat, Giant	Dipodomys ingens	Endangered	Terrestrial	No
Kangaroo Rat, Morro Bay	Dipodomys heermanni morroensis	Endangered	Terrestrial	Yes
Kangaroo Rat, San Bernardino Merriam's	Dipodomys merriami parvus	Endangered	Terrestrial	Yes
Kangaroo Rat, Stephens'	Dipodomys stephensi (incl. D. cascus)	Endangered	Terrestrial	No
Kangaroo Rat, Tipton	Dipodomys nitratoides nitratoides	Endangered	Terrestrial	No
Mountain Beaver, Point Arena	Aplodontia rufa nigra	Endangered	Freshwater, Terrestrial	No
Mouse, Pacific Pocket	Perognathus longimembris	Endangered	Terrestrial	No
Mouse, Salt Marsh Harvest	Reithrodontomys raviventris	Endangered	Terrestrial	No
Rabbit, Riparian Brush	Sylvilagus bachmani riparius	Endangered	Terrestrial	No
Sheep, Peninsular Bighorn	Ovis canadensis	Endangered	Terrestrial	Yes
Sheep, Sierra Nevada Bighom	Ovis canadensis californiana	Endangered	Terrestrial	No
Shrew, Buena Vista Lake Ornate	Sorex ornatus relictus	Endangered	Terrestrial	Yes
Vole, Amargosa	Microtus californicus scirpensis	Endangered	Terrestrial	Yes
Woodrat, Riparian	Neotoma fuscipes riparia	Endangered	Terrestrial	No
Monocot				
Alopecurus, Sonoma	Alopecurus aequalis var. sonomensis	Endangered	Terrestrial	Νo
Amole, Cammatta Canyon	Chlorogalum purpureum var. reductum	Threatened	Terrestrial	Yes
Amole, Purple	Chlorogalum purpureum var. purpureum	Threatened	Terrestrial	Yes
Bluegrass, Napa	Poa napensis	Endangered	Terrestrial, Freshwater	No
Bluegrass, San Bernardino	Poa atropurpurea	Endangered*	Terrestrial .	No
Brodiaea, Chinese Camp	Brodiaea pallida	Threatened	Terrestrial .	No
Brodiaea, Thread-leaved	Brodiaea filifolja	Threatened	Terrestrial	Yes
Grass, California Orcutt	Orcuttia californica	Endangered	Vernal pool, Terrestrial	No
Grass, Colusa	Neostapfia colusana	Threatened	Vernal pool	No
Grass, Eureka Dune	Swallenia alexandrae	Endangered	Terrestrial	No
Grass, San Joaquin Valley Orcutt	Orcuttia inaequalis	Threatened	Vernal pool	Yes
Grass, Solano	Tuctoria mucronata	Endangered	Vernal pool, Terrestrial	Yeş
Lily, Pitkin Marsh	Lilium pardalinum ssp. pitkinense	Endangered	Freshwater	No
Lily, Tiburon Mariposa	Calochortus tiburonensis	Threatened	Terrestrial	No
Lily, Western	Lilium occidentale	Endangered	Terrestrial	No
Onion, Munz's	Allium munzii	Endangered	Terrestrial	· No
Piperia, Yadon's	Piperia yadonii	Endangered	Terrestrial	Nο
Sedge, White	Carex albida	Endangered	Freshwater, Terrestrial	No
Reptile				

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Lizard, Blunt-nosed Leopard	Gambelia silus	Endangered	Terrestrial	No
Lizard, Coachella Valley Fringe-toed	Uma inornata	Threatened	Terrestrial	Yes
Lizard, Island Night	Xantusia riversiana	Threatened	Terrestrial	No
Sea turtie, green	Chelonia mydas	Endangered	Saltwater	No
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
Sea turtle, loggerhead	Caretta caretta	Threatened	Saltwater	No
Sea turtle, olive ridley	Lepidochelys olivacea	Threatened	Saltwater	No
Snake, Giant Garter	Thamnophis gigas	Threatened	Freshwater, Terrestrial	No
Snake, San Francisco Garter	Thamnophis sirtalis tetrataenia	Endangered	Freshwater, Terrestrial	No
Tortoise, Desert	Gopherus agassizii	Threatened	Terrestrial	Yes
Whipsnake (=Striped Racer), Alameda	Masticophis lateralis euryxanthus	Threatened	Terrestrial	Yes
Colorado (17)	species:			<u>C</u> H
Bird				
Crane, Whooping	Grus americana	Endangered	Terrestrial, Freshwater	Yes
Owl, Mexican Spotted	Strix occidentalis lucida	Threatened	Terrestrial	Yes
Dicot				
Beardtongue, Penland	Penstemon penlandii	Endangered	Terrestria!	No
Bladderpod, Dudley Bluffs	Lesquerella congesta	Threatened	Terrestrial	No
Butterfly Plant, Colorado	Gaura neomexicana var. coloradensis	Threatened	Terrestrial	Yes
Cactus, Knowlton	Pediocactus knowltonii	Endangered	Terrestriai	No
Cactus, Mesa Verde	Sclerocactus mesae-verdae	Threatened	Terrestrial	No
Cactus, Uinta Basin Hookless	Sclerocactus glaucus	Threatened	Terrestrial	No
Milk-vetch, Mancos	Astragalus humillimus	Endangered	Terrestria!	No
Milk-vetch, Osterhout	Astragalus osterhoutii	Endangered	Terrestrial	No
Mustard, Penland Alpine Fen	Eutrema penlandii	Threatened	Terrestrial, Freshwater	No
Phacelia, North Park	Phacelia formosula	Endangered	Terrestrial	No
Twinpod, Dudley Bluffs	Physaria obcordata	Threatened	Terrestrial	No
Wild-buckwheat, Clay-loving	Erlogonum pelinophilum	Endangered	Terrestrial	Yes
Mammal			₹ •	
Ferret, Black-footed	Mustela nigripes	Endangered	Terrestrial	No
Mouse, Preble's Meadow Jumping	Zapus hudsonius preblei	Threatened	Terrestrial	Yes
Monocot				
Ladies'-tresses, Ute	Spiranthes diluvialis	Threatened	Terrestrial	No
Connecticut (11)	species:			<u>CH</u>
Bird			•	
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
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Tern, Roseate Dicot	Sterna dougallii dougallii	Endangered	Terrestrial	No
Gerardia, Sandplain Mammal	Agalinis acuta	Endangered	Terrestrial .	No
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Monocot				
Pogonia, Small Whorled Reptile	Isotria medeoloides	Threatened	Terrestrial	No
Sea turtle, green	Chelonia mydas	Endangered	Saltwater	No
Sea turtie, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtle, Kemp's ridley	Lepidochelys kempii	Endangered	Saltwater	No
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
Sea turtle, loggerhead	Caretta caretta	Threatened	Saltwater	No
Turtle, Bog (Northern population)	Clemmys muhlenbergii	Threatened	Terrestrial, Freshwater	No
Delaware (10 Bird	D) species:	•		<u>CH</u>
Plover, Piping Mammal	Charadrius melodus	Endangered	Terrestrial	Yes
Squirrel, Delmarva Peninsula Fox	Sciurus niger cinereus	Endangered	Terrestrial	No
Monocot		·		
Pink, Swamp	Helonias bullata	Threatened	Terrestrial, Freshwater	No
Pogonia, Small Whorled	Isotria medeoloides	Threatened	Terrestrial	No
Reptile	•			
Sea turtle, green	Chelonia mydas	Endangered	Saitwater	No
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtle, Kemp's ridley	Lepidochelys kempii	Endangered	Saltwater	No
Sea turtie, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
Sea turtle, loggerhead	Caretta caretta	Threatened	Saltwater	No
Turtle, Bog (Northern population)	Clemmys muhlenbergii	Threatened	Terrestrial, Freshwater	No
Florida (88	3) species:			<u>CH</u>
Amphibian				
Salamander, Flatwoods	Ambystoma cingulatum	Threatened	Freshwater, Vernal pool, Terrestrial	No
Bird		• •		
Caracara, Audubon's Crested	Polyborus plancus audubonii	Threatened	Terrestrial	No
Kite, Everglade Snail	Rostrhamus sociabilis plumbeus	Endangered	Terrestrial	Yes
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
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Scrub-Jay, Florida	Aphelocoma coerulescens	Threatened	Terrestrial	No
Sparrow, Cape Sable Seaside	Ammodramus maritimus mirabilis	Endangered	Terrestrial	Yes
Sparrow, Florida Grasshopper	Ammodramus savannarum floridanus	Endangered	Terrestrial	No
Stork, Wood	Mycteria americana	Endangered	Terrestrial	No
Tern, Roseate	Sterna dougallii dougallii	Éndangered	Terrestrial	Νο
Woodpecker, Red-cockaded	Picoides borealis	Endangered	Terrestrial	No
Conf/cycds				
Torreya, Florida	Torreya taxifolia ,	Endangered	Terrestrial	No
Dicot				
Aster, Florida Golden	Chrysopsis floridana	Endangered	Terrestriat	No
Beliflower, Brooksville	Campanula robinsiae	Endangered	Terrestrial	No
Birds-in-a-nest, White	Macbridea alba	Threatened	Terrestrial	No
Błazing Star, Scrub	Liatris ohlingerae	Endangered	Terrestrial	No
Bonamia, Florida	Bonamia grandiflora	Threatened	Terrestriai	No
Buckwheat, Scrub	Eriogonum longifolium var. gnaphalifolium	Threatened	Terrestrial	No
Butterwort, Godfrey's	Pinguicula ionantha	Threatened	Terrestrial, Freshwater	No
Cactus, Key Tree	Pilosocereus robinii	Endangered	Terrestrial	No
Campion, Fringed	Silene polypetala	Endangered	Terrestrial	No
Chaffseed, American	Schwalbea americana	Endangered	Terrestrial	No
Fringe Tree, Pygmy	Chionanthus pygmaeus	Endangered	Terrestrial	No
Gooseberry, Miccosukee	Ribes echinellum	Threatened	Terrestrial	No
Gourd, Okeechobee	Cucurbita okeechobeensis ssp. okeechobeensis	Endangered	Terrestrial	No
Harebells, Avon Park	Crotalaria avonensis	Endangered	Terrestrial	No
Hypericum, Highlands Scrub	Hypericum cumulicola	Endangered	Terrestrial	No
Jacquemontia, Beach	Jacquemontia reclinata	Endangered	Terrestrial, Coastal (neritic)	No
Lead-plant, Crenulate	Amorpha crenulata	Endangered	Terrestrial	No
Lupine, Scrub	Lupinus aridorum	Endangered	Terrestrial	No
Meadowrue, Cooley's	Thalictrum cooleyi	Endangered	Terrestrial	No
Milkpea, Small's	Galactia smallii	Endangered	Terrestrial	No
Mint, Garrett's	Dicerandra christmanii	Endangered	Terrestrial	No
Mint, Lakela's	Dicerandra immaculata	Endangered	Terrestrial	No
Mint, Longspurred	Dicerandra cornutissima	Endangered	Terrestrial	No
Mint, Scrub	Dicerandra frutescens	Endangered	Terrestrial	No
Mustard, Carter's	Warea carteri	Endangered	Terrestrial	No
Pawpaw, Beautiful	Deeringothamnus pulchellus	Endangered	Terrestrial	No

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Pawpaw, Four-petal	Asimina tetramera	Endangered	Terrestrial	No
Pawpaw, Rugel's	Deeringothamnus rugelii	Endangered	Terrestrial	No
Pinkroot, Gentian	Spigelia gentianoides	Endangered	Terrestrial	No
Plum, Scrub	Prunus geniculata	Endangered	Terrestrial	No
Polygala, Lewton's	Polygala lewtonii	Endangered	Terrestrial	·No
Polygala, Tiny	Polygala smallii	Endangered	Terrestrial	No
Prickly-apple, Fragrant	Cereus eriophorus var. fragrans	Endangered	Terrestrial	No
Rhododendron, Chapman	Rhododendron chapmanii	Endangered	Terrestrial	No
Rosemary, Apalachicola	Conradina glabra	Endangered	Terrestrial	No
Rosemary, Etonia	Conradina etonia	Endangered	Terrestrial	No
Rosemary, Short-leaved	Conradina brevifolia	Endangered	Terrestrial	No
Sandlace	Polygonella myriophylla	Endangered	Terrestrial	No
Skullcap, Florida	Scutellaria floridana	Threatened	Terrestrial	No
Snakeroot	Eryngium cuneifolium	Endangered	Terrestrial	No
Spurge, Deltoid	Chamaesyce deltoidea ssp. deltoidea	Endangered	Terrestrial	No
Spurge, Garber's	Chamaesyce garberi	Threatened	Terrestrial	No
Spurge, Telephus	Euphorbia telephioides	Threatened	Terrestrial	No
Warea, Wide-leaf	Warea amplexifolia	Endangered	Terrestrial	No
Water-willow, Cooley's	Justicia cooleyi	Endangered	Terrestrial	No
Whitlow-wort, Papery	Paronychia chartacea	Threatened	Terrestrial	No
Wings, Pigeon	Clitoria fragrans	Threatened	Terrestrial	No
Wireweed	Polygonella basiramia	Endangered	Terrestrial	No
Ziziphus, Florida	Ziziphus celata	Endangered	Terrestrial	No
Lichen	•			
Cladonia, Florida Perforate	Cladonia perforata	Endangered	Terrestrial	No
Mammal				
Bat, Gray	Myotis grisescens	Endangered	Subterraneous, Terrestrial	No
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Deer, Key	Odocoileus virginianus clavium	Endangered	Terrestrial	No
Mouse, Anastasia Island Beach	Peromyscus polionotus phasma	Endangered .	Terrestrial, Coastal (neritic)	No
Mouse, Choctawhatchee Beach	Peromyscus polionotus allophrys	Endangered	Coastal (neritic), Terrestrial	Yes
Mouse, Key Largo Cotton	Peromyscus gossypinus	Endangered	Terrestrial	No
Mouse, Perdido Key Beach	Peromyscus polionotus trissyllepsis	Endangered	Coastal (neritic)	Yes
Mouse, Southeastern Beach	Peromyscus polionatus niveiventris	Threatened	Coastal (neritic), Terrestrial	No

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Mouse, St. Andrew Beach	Peromyscus polionotus	Endangered	Terrestrial, Coastal (neritic)	No
Panther, Florida	Puma (=Felis) concolor coryi	Endangered	Terrestrial	No
Rabbit, Lower Keys Marsh	Sylvilagus palustris hefneri	Endangered	Terrestrial	No
Rice Rat (=Silver Rice Rat)	Oryzomys palustris natator	Endangered	Terrestrial	Yes
Vole, Florida Salt Marsh	Microtus pennsylvanicus dukecampbelli	Endangered	Terrestrial, Brackish	No
Woodrat, Key Largo	Neotoma floridana smalli	Endangered	Terrestrial	No
Monocot				
Beargrass, Britton's	Nolina brittoniana	Endangered	Terrestrial	No
Beauty, Harper's	Harperocallis flava	Endangered	Freshwater, Terrestrial	No
Seagrass, Johnson's	Halophila johnsonii	Threatened	Coastal (neritic), Saltwater	Yes
Reptile				5
Crocodile, American	Crocodylus acutus	Threatened	Terrestrial, Freshwater	Yes
Sea turtle, green	Cheloпia mydas	Endangered	Saltwater	No
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtle, Kemp's ridley	Lepidochelys kempii	Endangered	Saltwater	No
Sea turtle, leatherback	Dermochelys coriacea	Eпdangered	Saltwater	Yes
Sea turtie, loggerhead	. Caretta caretta	Threatened	Saltwater	No
Skink, Blue-tailed Mole	Eumeces egregius lividus	Threatened	Terrestrial	No
Skink, Sand	Neoseps reynoldsi	Threatened	Terrestrial	No a
Snäke, Atlantic Salt Marsh	Nerodia clarkii taeniata	Threatened	Saltwater, Terrestrial, Brackish	No
Snake, Eastern Indigo	Drymarchon corais couperi	Threatened	Terrestrial	No
Georgia	(34) specijes:		•	<u>СН</u>
Amphibian				
Salamander, Flatwoods	Ambystoma cingulatum	Threatened	Freshwater, Vernal pool, Terrestrial	No
Bird				
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Stork, Wood	Mycteria americana	Endangered	Terrestrial	No
Warbler (=Wood), Kirtland's	Dendroica kirtlandii	Endangered	Terrestrial	No
Woodpecker, Red-cockaded	Picoides borealis	Endangered	Terrestrial	No
Conf/cycds				
Torreya, Florida	Torreya taxifolia	Endangered	Terrestrial	No
Dicot				
Amphianthus, Little	Amphianthus pusillus	Threatened	Freshwater	No
Barbara Buttons, Mohr's	Marshallia mohrii	Threatened	Terrestrial	No

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	Campion, Fringed	Silene polypetala	Endangered	Terrestrial	No
	Dropwort, Canby's	Oxypolis canbyi	Endangered	Terrestrial, Freshwater	No
	Harperella	Ptilimnium nodosum	Endangered	Freshwater	No
	Pitcher-plant, Green	Sarracenia oreophila	Endangered	Terrestrial, Freshwater	No
	Pondberry	Lindera melissifolia	Endangered	Terrestrial	No
	Rattleweed, Hairy	Baptisia arachnifera	Endangered	Terrestrial	No
	Skullcap, Large-flowered	Scutellaria montana	Threatened	Terrestrial	Nο
	Spiraea, Virginia	Spiraea virginiana	Threatened	Terrestrial	No
	Sumac, Michaux's	Rhus michauxii	Endangered	Terrestrial	No
	Ferns			:	
	Quillwort, Black-spored	Isoetes melanospora	Endangered	Vemal pool	No
	Quillwort, Mat-forming	Isoetes tegetiformans	Endangered	Vernal pool	Nο
	Mammal				
	Bat, Gray	Myotis grisescens	Endangered	Subterraneous, Terrestrial	No
	Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
	Bat, Virginia Big-eared	Corynorhinus (=Plecotus) townsendii virginianus	Endangered	Terrestrial, Subterraneo	us Yeş
	Monocot				
	Grass, Tennessee Yellow-eyed	Xyris tennesseensis	Endangered	Terrestrial	No
	Pink, Swamp	Helonias bullata	Threatened	Terrestrial, Freshwater	No
	Pogonia, Small Whorled	Isotria medeoloides	Threatened	Terrestrial	No
	Trillium, Persistent	Trillium persistens	Endangered	Terrestrial	No
	Trilljum, Relict	Trillium reliquum	Endangered	Terrestrial	Nο
	Water-plantain, Kral's	Sagittaria secundifolia	Threatened	Freshwater	No
	Reptile				
	Sea turtle, green	Chelonia mydas	Endangered	Saltwater	No
	Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
-	Sea turtle, Kemp's ridley	Lepidochelys kempli	Endangered	Saltwater	No
	Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
	Sea turtle, loggerhead	Caretta caretta	Threateлed	Saltwater	No
	Snake, Eastern Indigo	Drymarchon corais couperi	Threatened	Terrestrial	No
	Hawaii (304) species:			<u>CH</u>
	Bird	, ,			
	'Akepa, Hawaii	Loxops coccineus coccineus	Endangered	Terrestrial	No
	'Akepa, Maui	Loxops coccineus ochraceus	Endangered	Terrestrial	No
	'Akia Loa, Kauai (Hemignathus procerus)	Hemignathus procerus	Endangered	Terrestrial	No
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'Akia Pola'au (Hemignathus munroi)	Hemignathus munroi	Endangered	Terrestrial	No
Albatross, Short-tailed	Phoebastria (=Diomedea) albatrus	Endangered	Terrestrial, Saltwater	No
Coot, Hawaiian (=Alae keo keo)	Fulica americana alai	Endangered	Terrestrial	No
Creeper, Hawaii	Oreomystis mana	Endangered	Terrestrial	No
Creeper, Molokai (Kakawahie)	Paroreomyza flammea	Endangered	Terrestrial	Nο
Creeper, Oahu (Alauwahio)	Paroreomyza maculata	Endangered	Terrestrial	No
Crow, Hawaiian ('Alala)	Corvus hawaiiensis	Endangered	Terrestria!	No
Duck, Hawaiian (Kolca)	Anas wyvilliana	Endangered	Freshwater, Terrestrial	No
Duck, Laysan	Anas laysanensis	Endangered	Terrestrial, Freshwater	No
Elepaio, Oahu	Chasiempis sandwichensis ibidis	Endangered	Terrestrial	Yes
Finch, Laysan	Telespyza cantans	Endangered	Terrestrial	No
Finch, Nihoa	Telespyza ultima	Endangered	Terrestrial	. No
Goose, Hawaiian (Nene)	Branta (=Nesochen) sandvicensis	Endangered	Terrestrial, Freshwater	No
Hawk, Hawaiian (lo)	Buteo solitarius	Endangered	Terrestrial	No
Нолеусгеерег, Crested ('Akohekohe)	Palmeria dolei	Endangered	Terrestrial	No
· Millerbird, Nihoa	Acrocephalus familiaris kingi	Endangered	Terrestrial	No
Moorhen, Hawaiian Common	Gallinula chloropus sandvicensis	Endangered	Terrestrial	Νo
Nuku Pu'u	Hemignathus lucidus	Endangered	Terrestrial	No
'O'o, Kauai (≕'A'a)	Moho braccatus	Endangered	Terrestrial	No
'O'u (Honeycreeper)	Psittirostra psittacea	Endangered	Terrestrial	No
Palila	Loxioides bailleui	Endangered	Terrestrial 🥳	Yes
Parrotbill, Maui	Pseudonestor xanthophrys	Endangered	Terrestrial	No
Petrel, Hawaiian Dark-rumped	Pterodroma phaeopygia sandwichensis	Endangered	Terrestrial	No
Po'ouli	Melamprosops phaeosoma	Endangered	Terrestrial	No
Shearwater, Newell's Townsend's	Puffinus auricularis newelli	Threatened	Terrestrial, Saltwater	No
Stilt, Hawaiian (=Ae'o)	Himantopus mexicanus knudseni	Endangered	Terrestrial	No
Thrush, Large Kauai	Myadestes myadestinus	Endangered	Terrestrial	No
Thrush, Molokai (Oloma'o)	Myadestes lanaiensis rutha	Endangered	Terrestrial	No
Thrush, Small Kavai (Puaiohi)	Myadestes palmeri	Endangered	Terrestria!	No
Dicot				
Abutilon eremitopetalum (ncn)	Abutilon eremitopetalum	Endangered	Terrestrial	Yes
Abutilon sandwicense (ncn)	Abutilon sandwicense	Endangered	Terrestrial	Yes
Achyranthes mutica (ncn)	Achyranthes mutica	Endangered	Terrestrial	Yes
Achyranthes spiendens var. rotundata (ncn)	Achyranthes splendens var. rotundata	Endangered	Terrestrial	No
A'e (Zanthoxylum dipetalum var. tomentosum)	Zanthoxylum dipetalum var. tomentosum	Endangered	Terrestrial	Yes

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A'e (Zanthoxylum hawaiiense)	Zanthoxylum hawaiiense	Endangered	Terrestrial	Yes
'A)ea (Nothocestrum breviflorum)	Nothocestrum brevillorum	Endangered	Terrestrial	Yes
'Aiea (Nothocestrum peltatum)	Nothocestrum peltatum	Endangered	Terrestrial	Yes
'Akoko (Chamaesyce celastroides var. kaenana)	Chamaesyce celastroides var. kaenana	Endangered	Terrestrial	Yes
'Akoko (Chamaesyce deppeana)	Chamaesyce deppeana	Endangered	Terrestrial	Yes
'Akoko (Chamaesyce herbstii)	Chamaesyce herbstii	Endangered	Terrestrial	Yes
'Akoko (Chamaesyce kuwaleana)	Chamaesyce kuwaleana	Endangered	Terrestrial	Yes
'Akoko (Chamaesyce rockii)	Chamaesyce rockii	Endangered	Terrestrial	Yes
'Akoko (Chamaesyce skottsbergii var. skottsbe	Chamaesyce skottsbergii var. kalaeloana	Endangered	Terrestrial	No
'Akoko (Euphorbia haeleeleana)	Euphorbia haeleeleana	Endangered	Terrestrial	Yes
Alani (Melicope adscendens)	Melicope adscendens	Endangered	Terrestrial	Yes
Alani (Melicope balloui)	Melicope balloui	Endangered	Terrestrial	Yes
Alani (Melicope haupuensis)	Melicope haupuensis	Endangered	Terrestrial	Yes
Alani (Melicope knudsenii)	Melicope knudsenii	Endangered	Terrestrial	Yes
Alani (Melicope lydgatei)	Melicope lydgatei	Endangered	Terrestrial	Yes
Alani (Melicope mucronulata)	Melicope mucronulata	Endangered	Terrestrial	Yes
Alani (Melicope munroi)	Melicope munroi	Endangered	Terrestrial	No
Alani (Melicope ovalis)	Melicope ovalis	Endangered	Terrestrial	Yes
Alani (Melicope pallida)	Melicope pallida	Endangered	Terrestrial	Yes
Alani (Melicope quadrangularis)	Melicope quadrangularis	Endangered	Terrestrial	No
Alani (Melicope reflexa)	Melicope reflexa	Endangered	Terrestrial	Yes
Alani (Melicope saint-johnii)	Melicope saint-johnii	Endangered	Terrestrial	Yes
Alani (Melicope zahlbruckneri)	Melicope zahlbruckneri	Endangered	Terrestrial	Yes
Alsinidendron obovatum (non)	Alsinidendron obovatum	Endangered	Terrestrial	Yes
Alsinidendron trinerve (ncn)	Alsinidendron trinerve	Endangered	Terrestrial	Yes
Alsinidendron viscosum (ncn)	Alsinidendron viscosum	Endangered	Terrestrial	Yes
Amaranthus brownii (ncn)	Amaranthus brownii	Endangered	Terrestrial	Yes
'Anaunau (Lepidium arbuscula)	Lepidium arbuscula	Endangered	Terrestrial	Yes
'Anunu (Sicyos alba)	Sicyos alba	Endangered	Terrestrial	Yes
Aupaka (Isodendrion hosakae)	Isodendrion hosakae	Endangered	Terrestriai	Yes
Aupaka (Isodendrion laurifolium)	Isodendrion laurifolium	Endangered	Terrestrial	Yes
Aupaka (Isodendrion longifolium)	Isodendrion longifolium	Threatened	Terrestrial	Yes
'Awikiwiki (Canavalia molokaiensis)	Canavalia molokalensis	Endangered	Terrestrial	Yes
'Awiwi (Centaurium sebaeoides)	Centaurium sebaeoides	Endangered	Terrestrial	Yes
'Awiwi (Hedyotis cookiana)	Hedyotis cookiana	Endangered	Terrestrial	Yes
Bonamia menziesii (ncn)	Bonamia menziesii'	Endangered .	Terrestrial	Yes

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Chamaesyce Halemanui (ncn)	Chamaesyce halemanui	Endangered	Terrestrial	Yes
Cyanea undulata (ncn)	Cyanea undulata	Endangered	Terrestrial	Yes
Delissea rhytodisperma (ncn)	Delissea rhytidosperma	Endangered	Terrestrial	Yes
Dubautia latifolia (ncn)	Dubautia latifolia	Endangered	Terrestrial	Yes
Dubautia pauciflorula (ncn)	Dubautia pauciflorula	Endangered	Terrestrial	Yes
Geranium, Hawaiian Red-flowered	Geranium arboreum	Endangered	Terrestrial	Yes
Gouania hillebrandii (ncn)	Gouania hillebrandii	Endangered	Terrestrial	Yes
Gouania meyenii (ncn)	Gouania meyenii	Endangered	Terrestrial	Yes
Gouania vitifolia (ncn)	Gouania vitifolia	Endangered	Terrestrial	Yes
Haha (Cyanea acuminata)	Cyanea acuminata	Endangered	Terrestrial	Yes
Haha (Cyanea asarifolia)	Cyanea asarilolia	Endangered	Terrestrial	Yes
Haha (Cyanea copelandii ssp. copelandii)	Cyanea copelandii ssp. copelandii	Endangered	Terrestrial	No
Haha (Cyanea copelandii ssp. haleakalaenŝis)	Cyanea copelandii ssp. haleakalaensis	Endangered	Terrestrial	Yes
Haha (Cyanea Crispa) (=Rollandia crispa)	Cyanea (=Rollandia) crispa	Endangered	Terrestrial	Yes
Haha (Cyanea dunbarii)	Cyanea dunbarií	Endangered	Terrestrial	Yes
Haha (Cyanea glabra)	Cyanea glabra	Endangered	Terrestrial	Yes
Haha (Cyanea grimesiana ssp. grimesiana)	Cyanea grimesiana ssp. grimesiana	Endangered	Terrestrial	Yes
Haha (Cyanea grimesiana ssp. obatae)	Cyanea grimesiana ssp. obatae	Endangered	Terrestrial	Yes
Haha (Cyanea hamatiflora ssp. carlsonii)	Cyanea hamatiflora carlsonii	Endangered	Terrestrial	Yes
Haha (Cyanea hamatiflora ssp. hamatiflora)	,Cyanea hamatiflora ssp. hamatiflora	Endangered	Terrestrial	Yes
Haha (Cyanea humboldtiana)	Cyanea humboldtiana	Endangered	Terrestria!	Yes
Haha (Cyanea koolauensis)	Cyanea koolauensis	Endangered	Terrestrial	Yes
Haha (Cyanea longiflora)	Cyanea longiflora	Endangered	Terrestrial	Yes
Haha (Cyanea Macrostegia var. gibsonii)	Cyanea macrostegia ssp. gibsonii	Endangered	Terrestrial	No
Haha (Cyanea mannii)	Cyaṇea mannii	Endangered	Terrestrial	Yes
Haha (Cyanea mceldowneyi)	Cyanea mceldowneyi	Endangered	Terrestrial	Yes
Haha (Cyanea pinnatifida)	Cyanea pinnatifida	Endangered	Terrestrial	Yes
Haha (Cyanea platyphylia)	Cyanea platyphylla	Endangered	Terrestrial	Yes
Haha (Cyanea procera)	Cyanea procera	Endangered	Terrestrial	Yes
Haha (Cyanea recta)	Cyanea recta	Threatened	Terrestrial	Yes
Haha (Cyanea remyi)	Cyanea remyi	Endangered	Terrestrial	Yes
Haha (Cyanea shipmanii)	Cyanea shipmannii	Endangered	Terrestrial	Yes
Haha (Cyanea stictophylla)	Cyanea stictophylla	Endangered	Terrestrial	Yes

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Haha (Cyanea St-Johnii) (=Rollandia St-Johnii)	Cyanea st-johnii	Endangered	Terrestrial	Yes
Haha (Cyanea superba)	Суалеа superba	Endangered	Terrestrial	Yes
Ha'lwale (Cyrtandra crenata)	Cyrtandra crenata	Endangered	Terrestrial	No
Ha'lwale (Cyrtandra dentata)	Cyrtandra dentata	Endangered	Terrestrial	Yes
Ha'lwale (Cyrtandra giffardii)	Cyrtandra giffardii	Endangered	Terrestrial	Yes
Ha'Iwale (Cyrtandra limahuliensis)	Cyrtandra limahuliensis	Threatened	Terrestrial	Yes
Ha'lwale (Cyrtandra munroi)	Cyrtandra munroi	Endangered	Terrestrial	Yes
Ha'lwale (Cyrtandra polyantha)	Cyrtandra polyantha	Endangered	Terrestrial	Yes
Ha'lwale (Cyrtandra subumbellata)	Cyrtandra subumbellata	Endangered	Terrestria!	Yes
Ha'lwale (Cyrtandra tintinnabula)	Cyrtandra tintinnabula	Endangered	Terrestrial	Yes
Ha'lwale (Cyrtandra viridiflora)	Cyrtandra viridiflora	Endangered	Terrestrial	Yes
Haplostachys Haplostachya (ncn)	Haplostachys haplostachya	· Endangered	Terrestrial	No
Hau Kauhiwi (Hibiscade/phus woodi)	Hibiscadelphus woodii	Endangered	Terrestrial	Yes
Hau Kuahiwi (Hibiscadelphus distans)	Hibiscadelphus distans	Endangered	Terrestrial	No
Heau (Exocarpos luteolus)	Exocarpos luteolus	Endangered	Terrestrial	Yes
Hedyotis degeneri (non)	Hedyotis degeneri	Endangered	Terrestrial	Yes
Hedyotis parvula (non)	Hedyotis parvula	Endangered	Terrestrial	Yes
Hedyotis StJohnii (ncn)	Hedyotis stjohnii	Endangered	Terrestrial	Yes
Hesperomannia arborescens (non)	Hesperomannia arborescens	Endangered	Terrestrial	Yes
Hesperomannia arbuscula (non)	Hesperomannia arbuscula	Endangered	Terrestria!	Yes
Hesperomannia lydgatei (ncn)	Hesperomannia lydgatei	Endangered	Terrestrial	Yes
Hibiscus, Clay's	Hibiscus clayi	Endangered	Terrestrial	Yes
Holei (Ochrosia kilaueaensis)	Ochrosia kilaueaensis	Endangered	Terrestrial	No
fliau (Wilkesia hobdyi)	Wilkesia hobdyi	Endangered	Terrestrial	Yes
Kamakahala (Labordia cyrtandrae)	Labordia cyrtandrae	Endangered	Terrestria!	Yes
Kamakahala (Labordia lydgatei)	Labordia lydgatei	Endangered	Terrestrial	Yes
Kamakahala (Labordia tinifolia var. lanaiensis)	Labordia tinifolia var. lanaiensis	Endangered	Terrestrial	No
Kamakahala (Labordia tinifolia var. wahiawaen)	Labordia tinifolia var. wahiawaensis	Endangered	Terrestrial	Yes
Kamakahala (Labordia triflora)	Labordia triflora	Endangered	Terrestrial	No
Kanaloa kahoolawensis (ncn)	Kanaloa kahoolawensis	Endangered	Terrestrial	Yes
Kauila (Colubrina oppositifolia)	Colubrina oppositifolia	Endangered	Terrestrial	Yes
Kaulu (Pteralyxia kauaiensis)	Pteralyxia kauaiensis	Endangered	Terrestrial	Yes
Kio'Ele (Hedyotis coriacea)	Hedyotis coriacea	Endangered	Terrestrial	Yes
Kíponapona (Phyliostegia racemosa)	Phyllostegia racemosa	Endangered	Terrestrial	Yes
Koki'o (Kokia drynarioides)	Kokia drynarioides	Endangered	Terrestrial	Yes
Koki'o (Kokia kauaiensis)	Kokia kauaiensis	Endangered	Terrestrial	Yes
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Koki'o Ke'oke'o (Hibiscus arnottianus ssp. immaculatus)	Hibiscus arnottianus ssp. immaculatus	Endangered	Terrestrial	Yes
Koki'o Ke'oke'o (Hibiscus waimeae ssp. hannerae)	Hibiscus waimeae ssp. hannerae	Endangered	Terrestrial	Yes
Kolea (Myrsine juddii)	Myrsine juddii	Endangered	Terrestrial	Yes
Kolea (Myrsine linearifolia)	Myrsine linearifolia	Threatened	Terrestrial	Yes
Koʻokoʻolau (Bidens micrantha ssp. kalealaha)	Bidens micrantha ssp. kalealaha	Endangered	Terrestrial	Yes
Ko'oko'olau (Bîdens wiebkei)	Bidens wiebkei	Endangered	Terrestrial	Yes
Koʻoloaʻula (Abutilon menziesii)	Abutilon menziesii	Endangered	Terrestrial	No
Kopa (Hedyotis schlechtendahliana var. remyi)	Hedyotis schlechtendahliana var. remyi	Endangered	Terrestrial	No
Kuawawaenohu (Alsinidendron lychnoides)	Alsinidendron lychnoides	Endangered	Terrestrial	Yes
Kulu'l (Nototrichium humile)	Nototrichium humile	Endangered	Terrestrial	Yes
Laukahi Kuahiwi (Plantago hawaiensis)	Plantago hawaiensis	Endangered	Terrestrial	Yes
Laukahi Kuahiwi (Plantago princeps)	Plantago princeps	Endangered	Terrestrial	Yes
Laulihilihi (Schiedea stellarioides)	Schiedea stellarioides	Endangered	Terrestrial	Yes
Lipochaeta venosa (ncn)	Lipocha eta venosa	Endangered	Terrestrial	No
Lobelia monostachya (ncn)	Lobelia monostachya	Endangered	Terrestria!	Yes
Lobelia niihauensis (ncn)	Lobelia niihauensis	Endangered	Terrestrial	Yes
Lobelia oahuensis (ncn)	Lobelia oahuensis	Endangered	Terrestrial	Yes
Lysimachia filifolia (ncn)	Lysimachia filifolia	Endangered	Terrestrial	Yes
Lysimachia lydgatei (ncn)	Lysimachia lydgatei	Endangered	Terrestrial	Yes
Lysimachia maxima (non)	Lysimachìa maxima	Endangered	Terrestrial	Yes
Mahoe (Alectryon macrococcus)	Alectryon macrococcus	Endangerèd	Terrestrial	Yes
Makou (Peucedanum sandwicense)	Peucedanum sandwicense	Threatened	Terrestrial	Yes
Ma'o Hau Hele (Hibiscus brackenridgei)	Hibiscus brackenridgei	Endangered	Terrestria!	Yes
Ma'oti'oli (Schiedea apokremnos)	Schiedea apokremnos	Endangered	Terrestrial	Yes
Ma'oli'oli (Schiedea kealiae)	Schiedea kealiae	Endangered	Terrestrial	Yes
Mapele (Cyrtandra cyaneoides)	Cyrtandra cyaneoides	Endangered	Terrestrial	Yes
Mehamehame (Flueggea neowawraea)	Flueggea neowawraea	Endangered	Terrestrial	Yes
Munroidendron racemosum (ncn)	Munroidendron racemosum	Endangered	Terrestrial	Yes
Na'ena'e (Dubautia herbstobatae)	Dubautia herbstobatae	Endangered	Terrestrial	Yes
Na'ena'e (Dubautia plantaginea ssp. humilis)	Dubautia plantaginea ssp. humilis	Endangered	Terrestrial	Yes
Nani Wai'ale'ale (Viola kauaensis var. wahiawaensis)	Viola kauaiensis var. wahiawaensis	Endangered	Terrestria!	Yes
Naпu (Gardenia mannii)	Gardenia mannii	Endangered	Terrestrial	Yes

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Na'u (Gardenia brighamii)	Gardenia brighamii	Endangered	Terrestria!	No
Naupaka, Dwarf (Scaevola coriacea)	Scaevola coriacea	Endangered	Terrestrial	No
Nehe (Lipochaeta fauriei)	Lipochaeta fauriei	Endangered	Terrestrial	Yes
Nehe (Lipochaeta kamolensis)	Lipochaeta kamolensis	Endangered	Terrestrial	Yes
Nehe (Lipochaeta lobata var. leptophylla)	Lipochaeta lobata var. leptophylla	Endangered	Terrestrial	Yes
Nehe (Lipochaeta micrantha)	Lipochaeta micrantha	Endangered	Terrestrial	Yes
Nehe (Lipochaeta tenuifolia)	Lipochaeta tenuifolia	Endangered	Terrestrial	Yes
Nehe (Lipochaeta waimeaensis)	Lipochaeta waimeaensis	Endangered	Terrestrial	Yes
Neraudia angulata (ncn)	Neraudia angulata	Endangered	Terrestrial	Yes
Neraudia ovata (non)	Neraudia ovata	Endangered	Terrestrial	Yes
Neraudia sericea (non)	Neraudia sericea	Endangered	Terrestrial	Yes
Nioi (Eugenia koolauensis)	Eugenia koolauensis	Endangered	Terrestrial	Yes
Nohoanu (Geranium multiflorum)	Geranium multiflorum	Endangered	Terrestrial	Yes
'Oha (Delissea rivularis)	Delissea rivularis	Endangered	Terrestrial	Yes
'Oha (Delissea subcordata)	Delissea subcordata	Endangered	Terrestrial	Yes
'Oha (Delissea undulata)	Delissea undulata	Endangered	Terrestrial	Yes
'Oha (Lobelia gaudichaudii koolauensis)	Lobelia gaudichaudii ssp. koolauensis	Endangered	Terrestrial	Yes
'Oha Wai (Clermontia drepanomorpha)	Clermontia drepanomorpha	Endangered	Terrestria!	Yes
'Oha Wai (Clermontia lindseyana)	Clermontia lindseyana	Endangered	Terrestrial	Yes
'Oha Wai (Clermontia oblongifolia ssp. brevipes)	Clermontia oblongifolia ssp.	Endangered	Terrestrial	Yes
'Oha Wai (Clermontia oblongifolia ssp. mauiensis)	Clermontia oblongifolia ssp. mauiensis	Endangered	Terrestrial	Yes
'Oha Wai (Clermontia peleana)	Clermontia peleana	Endangered	Terrestrial	Yes
'Oha Wai (Ciermontia pyrularia)	Clermontia pyrularia	Endangered	Terrestrial	Yes
'Oha Wai (Clermontia samuelii)	Clermontia samuelii	Endangered	Terrestria)	Yes
'Ohai (Sesbania tomentosa)	Sesbania tomentosa	Endangered	Terrestrial	Yes
'Ohe'ohe (Tetraplasandra gymnocarpa)	Tetraplasandra gymnocarpa	Endangered	Terrestriai	Yes
'Olulu (Brighamia insignis)	Brighamia insignis	Endangered	Terrestria!	Yes
Opuhe (Urera kaalae)	Urera kaalae	Endangered	Terrestrial	Yes
Pamakani (Viola chamissoniana ssp. chamissoniana)	Viola chamissoniana ssp. chamissoniana	Endangered	Terrestrial	Yes
Phyliostegia hirsuta (ncn)	Phyllostegia hirsuta	Endangered	Terrestrial	Yes
Phyllostegia kaalaensis (ncn)	Phyllostegia kaalaensis	Endangered	Terrestrial	Yes
Phyliostegia knudsenii (ncn)	Phyllostegia knudsenii	Endangered	Terrestrial	Yes
Phyllostegia mannii (ncn)	Phyllostegia mannii	Endangered	Terrestrial	Yes
Phyliostegia mollis (ncn)	Phyllostegia mollis	Endangered	Terrestrial	Yes

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Phyllostegia parviflora (ncn)	Phyllostegia parviflora	Endangered	Terrestrial	Yes
Phyllostegia velutina (ncn)	Phyllostegia velutina	Endangered	Terrestrial	Yes
Phyllostegia waimeae (ncn)	Phyllostegia waimeae	Endangered	Terrestrial	Yes
Phyllostegia warshaueri (ncn)	Phyllostegia warshaueri	Endangered	Terrestrial	Yes
Phyllostegia wawrana (ncn)	Phyllostegia wawrana	Endangered	Terrestrial	Yes
Pilo (Hedyotis mannii)	Hedyotis mannii	Endangered	Terrestria!	Yes
Po'e (Portulaca sclerocarpa)	Portulaca scierocarpa	Endangered	Terrestrial	Yes
Popolo 'Aiakeakua (Solanum sandwicense)	Solanum sandwicense	Endangered	Terrestrial	Yes
Popolo Ku Mai (Solanum incompletum)	Solanum incompletum	Endangered	Terrestrial	Yes
Pua'ala (Brighamia rockii)	Brighamia rockii	Endangered	Terrestrial	Yes
Remya kauaiensis (ncn)	Remya kauaiensis	Endangered.	Terrestrial	Yes
Remya montgomeryi (ncn)	Remya montgomeryi	Endangered	Terrestrial	Yes
Remya, Maui .	Remya mauiensis	Endangered	Terrestrial	Yes
Sandalwood, Lanai (='lliahi)	Santalum freycinetianum var. Ianaiense	Enda⊓gered	Terrestrial	_. No
Sanicula mariversa (non)	Sanicula mariversa	Endangered	Terrestrial	Yes
Sanicula purpurea (non)	Sanicula purpurea	Endangered	Terrestrial	Yes
Schiedea haleakalensis (ncn)	Schiedea haleakalensis	Endangered	Terrestrial	Yes
Schiedea helleri (ncn)	Schiedea helleri	Endangered	Terrestrial	Yes
Schiedea hookeri (ncn)	Schiedea hookeri	Endangered	Terrestrial	Yes
Schiedea kaalae (ncn)	Schiedea kaalae	Endangered	Terrestrial	Yes
Schiedea kauaiensis (non)	Schiedea kauaiensis	Endangered	Terrestrial	Yes
Schiedea lydgatei (ncn)	Schiedea lydgatei	Endangered	Terrestrial	Yes
Schiedea membranacea (ncn)	Schiedea membranacea	Endangered	Terrestrial	Yes
Schiedea nuttallii (ncn)	Schiedea nuttallii	Endangered	Terrestrial	Yes
Schiedea sarmentosa (ncn)	Schiedea sarmentosa	Endangered	Terrestrial	Yes
Schiedea spergulina var, leiopoda (ncn)	Schiedea spergulina var. leiopoda	Endangered	Terrestrial	Yes
Schiedea spergulina var. spergulina (ncn)	Schiedea spergulina var. spergulina	Threatened	Terrestrial	Yes
Schiedea verticillata (ncn)	Schiedea verticillata	Endangered	Terrestrial	Yes
Schiedea, Diamond Head (Schiedea adamantis)	Schiedea adamantis	Endangered	Terrestrial	No
Silene alexandri (non)	Silene alexandri	Endangered	Terrestrial	Yes
Silene hawaiiensis (ncn)	Silene hawaiiensis	Threatened	Terrestria!	Yes
Silene lanceolata (ncn)	Silene lanceolata	Endangered	Terrestrial	Yes
Silene perimanii (ncn)	Silene perlmanii	Endangered	Terrestrial	Yes
Silversword, Haleakala ('Ahinahina)	Argyroxiphium sandwicense ssp. macrocephalum	Threatened	Terrestrial	Yes
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Silversword, Ka'u (Argyroxiphium kauense)	Argyroxiphium kauense	Endangered	Terrestrial	Yes
Silversword, Mauna Kea ('Ahinahina)	Argyroxiphium sandwicense ssp. sandwicense	Endangered	Terrestrial	Νo
Spermotepis hawaiiensis (ncn)	Spermolepis hawaiiensis	Endangered	Terrestrial	Yes
Stenogyne angustifolia (ncn)	Stenogyne angustifolia var. angustifolia	Endangered	Terrestrial	No
Stenogyne bifida (ncn)	Stenogyne bifida	Endangered	Terrestrial	Yes
Stenogyne campanulata (ncn)	Stenogyne campanulata	Endangered	Terrestrial	Yes
Stenogyne kanehoana (ncn)	Stenogyne kanehoana	Endangered	Terrestrial	Yes
Tetramolopium arenarium (ncn)	Tetramolopium arenarium	Endangered	Terrestrial	No
Tetramolopium capillare (ncn)	Tetramolopium capillare	Endangered	Terrestrial	Yes
Tetramolopium filiforme (non)	Tetramolopium filiforme	Endangered	Terrestrial	Yes
Tetramolopium lepidotum ssp. lepidotum (ncn)	Tetramolopium lepidotum ssp. lepidotum	Endangered	Terrestrial	Yes
Tetramolopium remyi (ncn)	Tetramolopium remyi	Endangered	Terrestrial	Yes
Tetramolopium rockii (ncn)	Tetramolopium rockii	Threatened	Coastal (neritic), Terrestrial	Yes
Trematolobelia singularis (non)	Trematolobelia singularis	Endangered	Terrestrial	Yes
Uhiuhi (Caesalpinia kavaiensis)	Caesalpinia kavaiense	Endangered	Terrestrial	No
Ulihi (Phyllostegia glabra var. lanaiensis)	Phyllostegia glabra var. lanaiensis	Endangered	Terrestrial	No
Vetch, Hawaiian (Vicia menziesii)	Vicia menziesii	Endangered	Terrestria!	No
Vigna o-wahuensis (ncn)	Vigna o-wahuensis	Endangered	Terrestrial '	Yes
Viola helenae (ncn)	Viola helenae	Endangered	Terrestrial	Yes
Viota lanaiensis (non)	Viola lanaiensis	Endangered	Terrestrial	No
Viola cahuensis (ncn)	Viola oahuensis	Endangered	Terrestrial	Yes
Wahine Noho Kula (Isodendrion pyrifolium)	Isodendrion pyrilolium	Endangered	Terrestrial	Yes
Xylosma crenatum (ncn)	Xylosma crenatum	Endangered	Terrestrial	Yes
Ferns			•	
Asplenium fragile var. insulare (ncn)	Asplenium fragile var, insulare	Endangered	Terrestrial	Yes
Diellia erecta (non)	Diellia erecta	Endangered	Terrestrial	Yes
Diellia falcata (ncn)	Diellia falcata	Endangered	Terrestrial	Yes
Diellia pallida (non)	Diellia pallida	Endangered	Terrestrial	Yes
Diellia unisora (non)	Diellia unisora	Endangered	Terrestrial .	Yes
Diplazium molokaiense (non)	Diplazium molokaiense	Endangered	Terrestrial	Yes
Fern, Pendant Kihi (Adenophorus periens)	Adenophorus periens	Endangered	Terrestrial	Yes
'lhi'lhi (Marsilea villosa)	Marsilea villosa	Endangered	Vernal pool, Terrestrial	Yes
Pauca (Ctenitis squamigera)	Ctenitis squamigera	Endangered	Terrestrial	Yes

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Pteris lidgatei (ncn)	Pteris lidgatei	Endangered	Terrestrial	Yes
Wawae'lole (Phlegmariurus (⇒Huperzia) mannii)	Huperzia mannii	Endangered	Terrestrial	Yes
Wawae'lole (Phlegmariurus (=Lycopodium) nutans)	Lycopodium (=Phlegmariurus) nutans	: Endangered	Terrestrial	Yes
Mammal				
Bat, Hawaiian Hoary	Lasiurus cinereus semotus	Endangered	Terrestrial, Subt	erraneous No
Monocot		_		
Bluegrass, Hawaiian	Poa sandvicensis	Endangered	Terrestrial	Yes
Bluegrass, Mann's (Poa mannii)	Poa mannii	Endangered	Terrestrial	Yes
Gahnia Lanaiensis (non)	Gahnia lanaiensis	Endangered	Terrestrial	No
Grass, Fosberg's Love	Eragrostis fosbergii	Endangered	Terrestrial	Yes
Hala Pepe (Pleomete hawaiiensis)	Pleomele hawaiiensis	Endangered	Terrestrial	Yes
Hilo Ischaemum (Ischaemum byro		Endangered	Terrestrial	Yes
Kamanomano (Cenchrus	Cenchrus agrimonioides	Endangered	Terrestrial	Yes
agrimonioides)		J.		
Lau'ehu (Panicum niihauense)	Panicum niihauense	Endangered	Terrestrial	Yes
Lo`ulu (Pritchardia affinis)	Pritchardia affinis	Endangered	Terrestrial	No
Lo`ulu (Pritchardia kaalae)	Pritchardia kaalae	Endangered	Terrestrial	No
Lo`ulu (Pritchardia munroi)	Pritchardia munroi	Endangered	Terrestrial	· Yes
Lo`ulu (Pritchardia napaliensis)	Pritchardia napaliensis	Endangered	Terrestrial	No
Lo`ulu (Pritchardia remota)	Pritchardia remota	Endangered	Terrestrial	Yes
Lo`ulu (Pritchardia schattaueri)	Pritchardia schattaueri	Endangered	Terrestrial	No
Lo`ulu (Pritchardia viscosa)	Pritchardia viscosa	Endangered	Terrestrial	No
Mariscus fauriei (ncn)	Mariscus fauriei	Endangered	Terrestrial	Yes
Mariscus pennatiformis (non)	Mariscus pennatiformis	Endangered	Terrestrial	Yes
Panicgrass, Carter's (Panicum faur var.carteri)	iei Panicum fauriel var. carteri	Endangered	Terrestrial	Yes
Platanthera holochila (ncn)	Platanthera holochila	Endangered	Terrestrial	Yes
Poa siphonoglossa (ncn)	Poa siphonoglossa	Endangered	Terrestrial	Yes
Pu'uka'a (Cyperus trachysanthos)	Cyperus trachysanthos	Endangered	Terrestrial	Yes
Wahane (Pritchardia aylmer- robinsonii)	Pritchardia aylmer-robinsonii	Endangered	Terrestrial	No
Reptile				
Sea turtle, green	Chelonia mydas	Endangered	Saltwater	No
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtie, leatherback	Dermochelys coriacea	Endangered.	Saltwater	Yes
Sea turtle, loggerhead	Caretta caretta	Threatened	Saltwater	No
Idaho (1	7) species:			<u>СН</u>

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	Bird				•	
	Crane, Whooping		Grus americana	Endangered	Terrestrial, Freshwat	er Yes
	Dicot					
	Catchfly, Spalding's		Silene spaldingii	Threatened	Terrestrial	No
	Four-o'clock, Macfarlane's		Mirabilis macfarlanei	Threatened	Terrestrial	No
	Howellia, Water		Howellia aquatilis	Threatened	Freshwater	No
	Mammal					
	Bear, Grizzly		Ursus arctos horribilis	Threatened	Terrestrial	No
	Caribou, Woodland		Rangifer tarandus caribou	Endangered	Terrestrial	No
	Squirrel, Northern Idaho Ground	i	Spermophilus brunneus brunneus	Threatened	Terrestrial	No
	Illinois	(13)	species:			<u>CH</u>
	Bird	, ,				
	Plover, Piping		Charadrius melodus	Endangered	Terrestrial	Yes
	Tem, Interior (population) Least		Sterna antillarum	Endangered	Terrestrial	No
	Dicot				•	
	Aster, Decurrent False		Boltonia decurrens	Threatened	Terrestrial, Freshwat	er No
	Clover, Leafy Prairie		Dalea foliosa	Endangered	Terrestrial	No
	Clover, Prairie Bush		Lespedeza leptostachya	Threatened	Terrestrial	No
	Daisy, Lakeside		Hymenoxys herbacea	Threatened	Freshwater	No
	Milkweed, Mead's		Asclepias meadii	Threatened	Terrestrial	No
	Potato-bean, Price's		Apios priceana	Threatened	Terrestrial	No
	Thistle, Pitcher's		Cirsium pitcheri	Threatened	Terrestrial	No
	Mammal					
	Bat, Gray		Myotis grisescens	Endangered	Subterraneous, Terrestrial	No
-	Bat, Indiana		Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
	Monocot					
	Orchid, Eastern Prairie Fringed		Platanthera leucophaea	Threatened	Terrestrial	No
	Pogonia, Small Whorled		Isotria medeoloides	Threatened	Terrestrial	No
	<i>Indiana</i> Bird	(10)	species:			<u>CH</u>
	Plover, Piping		Charadrius melodus	Endangered	Terrestrial	Yes
	Tern, Interior (population) Least		Sterna antillarum	Endangered	Terrestrial	No
	Dicot					
	Clover, Running Buffalo		Trifolium stoloniferum	Endangered	Terrestrial	No
	Goldenrod, Short's		Solidago shortii	Endangered	Terrestrial	No
	Milkweed, Mead's		Asclepias meadii	Threatened	Terrestrial	No
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Thistle, Pitcher's Mammal	Cirsium pitcheri	Threatened	Terrestrial	No
Bat, Gray	Myolis grisescens	Endangered	Subterraneous, Terrestrial	No
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Monocot				
Orchid, Eastern Prairie Fringed	Platanthera leucophaea	Threatened	Terrestrial	Nο
Reptile				
Snake, Northern Copperbelly Wa	ter Nerodia erythrogaster neglecta	Threatened	Freshwater, Terrestrial	No
lowa	(9) species:			<u>CH</u>
Bird	, , ,			_
Plover, Piping	Charadrius melodus	Endangered	Terrestrial .	Yes
Tem, Interior (population) Least	Stema antillarum	Endangered	Terrestria!	No
Dicot				
Clover, Prairie Bush	Lespedeza leptostachya	Threatened	Terrestrial	No
Milkweed, Mead's	Asclepias meadii	Threatened 1	Terrestrial	No
Monkshood, Northern Wild	Aconitum noveboracense	Threatened	Terrestriał	No
Ferns				
Fern, American hart's-tongue	Asplenium scolopendrium var. americanum	Threatened .	Terrestrial	No
Mammal _s				
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Monocot				
Orchid, Eastern Prairie Fringed	Platanthera leucophaea	Threatened	Terrestrial	No
Orchid, Western Prairie Fringed	Platanthera praeclara	Threatened	Terrestrial	Νo
Kansas	(7) species:			<u>СН</u>
Bird			*	
Crane, Whooping	Grus americana	Endangered	Terrestrial, Freshwater	Yes
Plover, Piping	Charadrius melodus	Endangered	Terrestria!	Yes
Tern, Interior (population) Least Dicot	Sterna antillarum	Endangered	Terrestrial	No
Milkweed, Mead's	Asclepias meadii	Threatened	Terrestrial	No
Mammal				
Bat, Gray	Myotis grisescens	Endangered	Subterraneous, Terrestrial	No
Ferret, Black-footed Monocot	Mustela nigripes	Endangered .	Terrestrial .	No

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Orchid, Western Prairie Fringed	Platanthera praeclara	Threatened	Terrestrial	No
-	·	Tipeateried	renesma	
<i>Kentucky</i> Bird	(19) species:	•		<u>CH</u>
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Tern, Interior (population) Least	Sterna antillarum	Endangered	Terrestrial	No
Warbler (=Wood), Kirtland's	Dendroica kirtlandii	Endangered	Terrestrial	No
Warbler, Bachman's	Vermivora bachmanii	Endangered	Terrestrial	No
Woodpecker, Ivory-billed	Campephilus principalis	Endangered	Terrestrial	No
Woodpecker, Red-cockaded	Picoides borealis	Endangered	Terrestrial	No
Dicot				
Chaffseed, American	Schwalbea americana	Endangered	Terrestrial	No
Clover, Running Buffalo	Trifolium stoloniferum	Endangered	Terrestrial	No
Goldenrod, Short's	Solidago shortii	Endangered	Terrestria!	No
Goldenrod, White-haired	Solidago albopilosa	Threatened	Terrestrial	No
Potato-bean, Price's	Apios priceana	Threatened	Terrestrial	No
Rock-cress, Large (=Braun's)	Arabis perstellata E. L. Braun var. ampla Rollins	Endangered	Terrestrial	Yes
Rock-cress, Small	Arabis perstellata E. L. Braun var. perstellata Fernald	Endangered	Terrestrial	Yes
Rosemary, Cumberland	Conradina verticillata	Threatened	Terrestrial	No
Sandwort, Cumberland	Arenaria cumberlandensis	Endangered	Terrestrial	- No
Spiraea, Virginia	Spiraea virginiana	Threatened	Terrestrial	÷ No.
Mammal				
Bat, Gray	Myotis grisescens	Endangered	Subterraneous, Terrestrial	No
Bat, Indiana	Myotis sodalis	Endangered ^a	Subterraneous, Terrestrial	Yes
Bat, Virginia Big-eared	Corynorhinus (=Plecotus) townsendii virginianus	Endangered	Terrestrial, Subterra	aneous Yes
Louisiana	(15) species:			<u>CH</u>
Bird				
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Tern, California Least	Sterna antillarum browni	Endangered	Terrestrial	No
Tern, Interior (population) Least	Sterna antillarum	Endangered	Terrestrial	No
Woodpecker, Red-cockaded	Picoides borealis	Endangered	Terrestrial	No
Dicot				
Chaffseed, American	Schwalbea americana	Endangered	Terrestrial	No
Fruit, Earth (=geocarpon)	Geocarpon minimum	Threatened	Terrestrial	No
Ferns				

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Quillwort, Louisiana Mammal	Isoetes louisianensis	Endangered	Freshwater, Terrestrial	No
Bear, Louisiana Black Reptile	Ursus americanus luteolus	Threatened	Terrestrial	No
Sea turtle, green	Chelonia mydas	Endangered	Saltwater	No
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtle, Kemp's ridley	Lepidochelys kempii	Endangered	Saltwater	No
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
Sea turtle, loggerhead	Caretta caretta	Threatened	Saltwater	No
Tortoise, Gopher	Gopherus polyphemus	Threatened	Terrestrial	No
Turtie, Ringed Sawback	Graptemys oculitera	Threatened	Freshwater, Terrestrial	No
Maine	(7) species:	***************************************	Troumage, Ferrodina	
Bird	(7) species.			<u>СН</u>
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Tern, Roseate	Sterna dougallii dougallii	Endangered	Terrestrial	No
Dicot	Oterna dougam oougam	Lindangered	Concential	NO
Lousewort, Furbish	Pedicularis furbishiae	Endangered	Terrestrial	No
Mammal	r enoughs rubishee	Lindangered	, or ostra	NO
Lynx, Canada	Lynx canadensis	Threatened	Terrestrial	No
Monocot	Lynx danadonois	Threatened) on ostrial	110
Orchid, Eastern Prairie Fringed	Platanthera leucophaea	Threatened	Terrestrial	No
Pogonia, Small Whorled	Isotria medeoloides	Threatened:	Terrestrial	No
Reptile	isoma measoroides	'.	Torrostriai	110
Sea turtie, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
· _		Linualigatea	Camaro	
<i>Maryland</i> Bird	(14) species:			<u>ÇH</u>
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Dicot	Gnaradinas meiodus	Littangerea	Terrestital	165
Dropwort, Canby's	Oxypolis canbyi	Endangered	Terrestrial, Freshwater	No
Gerardia, Sandplain	Agalinis acuta	Endangered	Terrestrial	No
Harperella	Ptilimnium nodosum	Endangered	Freshwater	No
Joint-vetch, Sensitive	Aeschynomene virginica	Threatened	Terrestrial, Brackish	No ·
Mammal	ricsonynomene viiginaa	Threatened	remedial, branken	740
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous,	Yes
Dat, maiana		Endangered	Terrestrial	100
Squirrel, Delmarva Peninsula Fo	ox Sciurus niger cinereus	Endangered	Terrestrial	No
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Bulrush, Northeastern (=Barbed Bristle)	Scirpus ancistrochaetus	Endangered	Terrestrial, Freshwater	Ņa
Pink, Swamp	Helonias bullata	Threatened	Terrestrial, Freshwater	No
Reptile			•	
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtle, Kemp's ridley	Lepidochelys kempii	Endangered	Saltwater	Nο
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
Sea turtie, loggerhead	Caretta caretta	Threatened	Saltwater	No
Turtle, Bog (Northern population)	Clemmys muhlenbergii	Threatened	Terrestrial, Freshwater	No
Massachusetts (12	2) species:			<u>CH</u>
Bird				_
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Tern, Roseate	Stema dougallii dougallii	Endangered	Terrestrial	No
Dicot			•	
Gerardia, Sandplain	Agalinis acuta	Endangered	Terrestrial	No
Mammal				
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Monocot				
Bulrush, Northeastern (=Barbed Bristle)	Scirpus ancistrochaetus	Endangered	Terrestrial, Freshwater	No
Pogonia, Small Whorled	Isotria medeoloides	Threatened	Terrestria!	No
Reptile				
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtie, Kemp's ridley	Lepidochelys kempii	Endangered	Saltwater	No
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
Sea turtle, loggerhead	Caretta caretta	Threatened	Saltwater	No
Turtle, Bog (Northern population)	Clemmys muhlenbergii	Threatened	Terrestrial, Freshwater	No
Turtle, Plymouth Red-bellied	Pseudernys rubriventris bangsi	Endangered	Terrestrial, Freshwater	Yes
Michigan (13) species:			<u>CH</u>
Bird				
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Warbler (=Wood), Kirtland's	Dendroica kirtlandii	Endangered	Terrestrial	No
Dicot	•		•	
Daisy, Lakeside	Hymenoxys herbacea	Threatened	Freshwater	No
Goldenrod, Houghton's	Solidago houghtonii	Threatened	Terrestrial	No
Monkey-flower, Michigan	Mimulus glabratus var. michiganensis	Endangered	Terrestrial, Freshwater	No
Thistle, Pitcher's	Cirsium pitcheri	Threatened	Terrestrial	No
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	Ferns				
	Fern, American hart's-tongue	Asplenium scolopendrium var. americanum	Threatened	Terrestrial	No -
	Mammal				
	Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
	Lynx, Canada Monocot	Lynx canadensis	Threatened	Terrestrial	No
	Iris, Dwarf Lake	Iris lacustris	Threatened	Terrestrial	Nø
	Orchid, Eastern Prairie Fringed	Platanthera leucophaea	Threatened	Terrestrial	No
	Pogonia, Small Whorled Reptile	Isotria medeoloides	Threatened	Terrestrial .	No
	Snake, Northern Copperbelly Water	Nerodia erythrogaster neglecta	Threatened	Freshwater, Terrestrial	No
	Minnesota (6) s Bird	pecies:			<u>СН</u>
	Plover, Piping Dicot	Charadrius melodus	Endangered	Terrestrial	Yes
	Clover, Prairie Bush	Lespedeza leptostachya	Threatened	Terrestrial	No
	Roseroot, Leedy's	Sedum integrifolium ssp. leedyi	Threatened	Terrestrial	No
	Mammal		•		
	Lynx, Canada	Lynx canadensis	Threatened	Terrestrial	No
	Monocot	: ·		· -	
	Lily, Minnesota Trout	Erythronium propullans	Endangered	Terrestrial	No
	Orchid, Western Prairie Fringed	Platanthera praeclara	Threatened	Terrestrial	No
	<i>Mississippi</i> (20) Amphibian	species:			<u>CH</u>
	Frog, Dusky Gopher (Mississippi DPS) Bird	Rana capito sevosa	Endangered	Terrestrial, Freshwater	No
	Crane, Mississippi Sandhill	Grus canadensis pulla	Endangered	Terrestrial, Freshwater	Yes
	Plover, Pîpîng	Charadrius melodus	Endangered	Terrestrial	Yes
	Tern, Interior (population) Least	Sterna antillarum ·	Endangered	Terrestrial	No
	Woodpecker, Red-cockaded Dicot	Picoides borealis	Endangered	Terrestrial	No
	Pondberry	Lindera melissifolia	Endangered	Terrestrial	No
	Potato-bean, Price's	Apios priceana	Threatened	Terrestrial	No
	Ferns				
	Quillwort, Louisiana	Isoetes louisianensis	Endangered	Freshwater, Terrestrial	No
	Mammal				
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Bat, Gray	Myotis grisescens	Endangered	Subterraneous, Terrestrial	No
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Bear, Louisiana Black Reptile	Ursus americanus luteolus	Threatened	Terrestrial	No
Sea turtle, green	Chelonia mydas	Endangered	Saltwater	No
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtle, Kemp's ridley	Lepidochelys kempii	Endangered	Saltwater	No
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
Seá turtle, loggerhead	Caretta caretta	Threatened	Saltwater	No
Snake, Eastern Indigo	Drymarchon corais couperi	Threatened	Terrestrial	No
Tortoise, Gopher	Gopherus polyphemus	Threatened	Terrestria!	No
Turtle, Ringed Sawback	Graptemys oculifera	Threatened	Freshwater, Terrestrial	No
Turtle, Yellow-blotched Map	Grapţêmys flavimaculata	Threateлed	Freshwater, Terrestrial	No
Missouri	(12) species:			СН
Bird		•		
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Tern, Interior (population) Least	Sterna antillarum	Endangered	Terrestrial	No
Dicot				
Aster, Decurrent False	Boltonia decurrens	Threatened	Terrestrial, Freshwater	No
Bladderpod, Missouri	Lesquerella filiformis	Threatened	Terrestrial	No
Clover, Running Buffalo	Trifolium stoloniferum	Endangered	Terrestrial	No
Fruit, Earth (=geocarpon)	Geocarpon minimum	Threatened	Terrestrial	No
Milkweed, Mead's	Asclepias meadii	Threatened	Terrestrial	No
Pondberry	Lindera melissifolia	Endangered	Terrestrial	No
Sneezeweed, Virginia	Helenium virginicum	Threatened	Vernal pool	No
Mammal	·			
Bat, Gray	Myotis grisescens	Endangered	Subterraneous, Terrestrial	No
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Monocot	•			
Orchid, Western Prairie Fringed	Platanthera praeclara	Threatened	Terrestrial	No
<i>Montana</i> Bird	(7) species:			<u>CH</u>
Crane, Whooping	Grus americana	Endangered	Terrestrial, Freshwater	Yes
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Tern, Interior (population) Least	Sterna antillarum	Endangered	Terrestrial	No
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Dicot				
Catchfly, Spalding's	Silene spaldingii	Threatened	Terrestrial	No
Howellia, Water	Howellia aquatilis	Threatened	Freshwater	No
Mammal				
Bear, Grizzly	Ursus arctos horribilis	Threatened	Terrestrial	No
Ferret, Black-footed	Mustela nigripes	Endangered	Terrestrial	No
<i>Nebraska</i> Bird	(7) species:			<u>CH</u>
Crane, Whooping	Grus americana	Endangered	Terrestrial, Freshwater	Yes
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Tern, Interior (population) Least Dicot	Sterna antillarum	Endangered	Terrestrial .	No
Butterfly Plant, Colorado	Gaura neomexicana var. coloradensis	Threatened	Terrestrial	Yes
Peristemon, Blowout Маттаі	Penstemon haydenli	Endangered	Terrestrial	No
Ferret, Black-footed	Mustela nigripes	Endangered	Terrestrial	No
Monocot				
Orchid, Western Prairie Fringed	Platanthera praeclara	Threatened	Terrestrial	No
Nevada	(12) species:			<u>CH</u>
<i>Nevada</i> Bird	(12) species:			<u>СҢ</u>
		Endangered	Terrestrial	<u>CH</u> Yes
Bird		Endangered Endangered	Terrestrial Terrestrial	
Bird Flycatcher, Southwestern Willow	Empidonax traillii extimus	-		Yes
Bird Flycatcher, Southwestern Willow Rail, Yuma Clapper	Empidonax traillii extimus Rallus longirostris yumanensis	-		Yes
Bird Flycatcher, Southwestern Willow Rail, Yuma Clapper Dicot	Empidonax traillii extimus Rallus longirostris yumanensis	Endangered	Terrestria!	Yes No
Bird Flycatcher, Southwestern Willow Rail, Yuma Clapper Dicot Blazing Star, Ash Meadows	Empidonax traillii extimus Rallus longirostris yumanensis Mentzelia leucophylla Eriogonum ovalifolium var.	Endangered Threatened	Terrestrial	Yes No Yes
Bird Flycatcher, Southwestern Willow Rail, Yuma Clapper DicOt Blazing Star, Ash Meadows Buckwheat, Steamboat	Empidonax traillii extimus Rallus longirostris yumanensis Mentzelia leucophylla Eriogonum ovalifolium var. williamsiae Centaurium namophilum Grindelia fraxino-pratensis	Threatened Endangered Threatened Threatened	Terrestrial Terrestrial	Yes No Yes No
Bird Flycatcher, Southwestern Willow Rail, Yuma Clapper DicOt Blazing Star, Ash Meadows Buckwheat, Steamboat Centaury, Spring-loving	Empidonax traillii extimus Rallus longirostris yumanensis Mentzelia leucophylla Eriogonum ovalifolium var. williamsiae Centaurium namophilum	Endangered Threatened Endangered Threatened	Terrestrial Terrestrial Terrestrial	Yes No Yes No Yes
Bird Flycatcher, Southwestern Willow Rail, Yuma Clapper DicOt Blazing Star, Ash Meadows Buckwheat, Steamboat Centaury, Spring-loving Gumplant, Ash Meadows	Empidonax traillii extimus Rallus longirostris yumanensis Mentzelia leucophylla Eriogonum ovalifolium var. williamsiae Centaurium namophilum Grindelia fraxino-pratensis	Threatened Endangered Threatened Threatened	Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial	Yes No Yes No Yes Yes
Bird Flycatcher, Southwestern Willow Rail, Yuma Clapper DicOt Blazing Star, Ash Meadows Buckwheat, Steamboat Centaury, Spring-loving Gumplant, Ash Meadows Ivesia, Ash Meadows	Empidonax traillii extimus Rallus longirostris yumanensis Mentzelia leucophylla Eriogonum ovalifolium var. williamsiae Centaurium namophilum Grindelia fraxino-pratensis Ivesia kingii var. eremica	Threatened Endangered Threatened Threatened Threatened	Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial	Yes No Yes No Yes Yes
Bird Flycatcher, Southwestern Willow Rail, Yuma Clapper DicOt Blazing Star, Ash Meadows Buckwheat, Steamboat Centaury, Spring-loving Gumplant, Ash Meadows Ivesia, Ash Meadows Milk-vetch, Ash Meadows Niterwort, Amargosa Sunray, Ash Meadows	Empidonax traillii extimus Rallus longirostris yumanensis Mentzelia leucophylla Eriogonum ovalifolium var. williamsiae Centaurium namophilum Grindelia fraxino-pratensis Ivesia kingii var. eremica Astragalus phoenix	Threatened Endangered Threatened Threatened Threatened Threatened Threatened	Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial	Yes No Yes No Yes Yes Yes
Bird Flycatcher, Southwestern Willow Rail, Yuma Clapper DicOt Blazing Star, Ash Meadows Buckwheat, Steamboat Centaury, Spring-loving Gumplant, Ash Meadows Ivesia, Ash Meadows Milk-vetch, Ash Meadows Niterwort, Amargosa	Empidonax traillii extimus Rallus longirostris yumanensis Mentzelia leucophylla Eriogonum ovalifolium var. williamsiae Centaurium namophilum Grindelia fraxino-pratensis Ivesia kingii var. eremica Astragalus phoenix Nitrophila mohavensis Enceliopsis nudicaulis var. corrugata	Threatened Endangered Threatened Threatened Threatened Threatened Threatened Endangered	Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial	Yes No Yes No Yes Yes Yes Yes Yes Yes Yes
Bird Flycatcher, Southwestern Willow Rail, Yuma Clapper DicOt Blazing Star, Ash Meadows Buckwheat, Steamboat Centaury, Spring-loving Gumplant, Ash Meadows Ivesia, Ash Meadows Milk-vetch, Ash Meadows Niterwort, Amargosa Sunray, Ash Meadows Monocot Ladies'-tresses, Ute	Empidonax traillii extimus Rallus longirostris yumanensis Mentzelia leucophylla Eriogonum ovalifolium var. williamsiae Centaurium namophilum Grindelia fraxino-pratensis Ivesia kingii var. eremica Astragalus phoenix Nitrophila mohavensis	Threatened Endangered Threatened Threatened Threatened Threatened Threatened Endangered	Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial	Yes No Yes No Yes Yes Yes Yes
Bird Flycatcher, Southwestern Willow Rail, Yuma Clapper DicOt Blazing Star, Ash Meadows Buckwheat, Steamboat Centaury, Spring-loving Gumplant, Ash Meadows Ivesia, Ash Meadows Milk-vetch, Ash Meadows Niterwort, Amargosa Sunray, Ash Meadows Monocot	Empidonax traillii extimus Rallus longirostris yumanensis Mentzelia leucophylla Eriogonum ovalifolium var. williamsiae Centaurium namophilum Grindelia fraxino-pratensis Ivesia kingii var. eremica Astragalus phoenix Nitrophila mohavensis Enceliopsis nudicaulis var. corrugata	Endangered Threatened Threatened Threatened Threatened Threatened Threatened Endangered Threatened	Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial Terrestrial	Yes No Yes No Yes Yes Yes Yes Yes Yes Yes

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<i>New Hampshire</i> Dicot	(4) species:			<u>СН</u>
Milk-vetch, Jesup's Mammal	Astragalus robbinsii var. jesupi	Endangered	Terrestrial	No
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Monocot Pogonia, Small Whorled Reptile	Isotria medeoloides	Threatened	Terrestrial	No
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
<i>New Jersey</i> Bird	(13) species:			<u>CH</u>
Curlew, Eskimo	Numenius borealis	Endangered	Terrestrial	No
Plover, Piping Dicot	Charadrius melodus	Endangered	Terrestrial	Yes
Chaffseed, American	Schwalbea americana	Endangered	Terrestrial	No
Joint-vetch, Sensitive Mammal	Aeschynomene virginica	Threatened	Terrestrial, Brackish	No
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Monocot	•		,	
Beaked-rush, Knieskern's	Rhynchospora knieskemii	Threatened	Terrestrial	No
Pink, Swamp	Helonias bullata	Threatened	Terrestrial, Freshwater	No
Родоліа, Small Whorled Reptile	Isotria medeoloides	Threatened	Terrestrial	No
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtle, Kemp's ridley	Lepidochelys kempii	Endangered	Saltwater	No
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
Sea turtle, loggerhead	Caretta caretta	Threatened	Saltwater	No
Turtle, Bog (Northern population		Threatened	Terrestrial, Freshwater	No
<i>New Mexico</i> Amphibian	(25) species:			<u>CH</u>
Frog, Chiricahua Leopard Bird	Rana chiricahuensis	Threatened	Freshwater, Terrestrial	No
Crane, Whooping	Grus americana	Endangered	Terrestrial, Freshwater	Yes
Faicon, Northern Aplomado	Falco femoralis septentrionalis	Endangered	Terrestrial	No
Flycatcher, Southwestern Willow	ı Empidonax traillii extimus	Endangered	Terrestrial	Yes

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	Owl, Mexican Spotted		Strix occidentalis lucida	Threatened	Terrestria!	Yes
	Plover, Piping		Charadrius melodus	Endangered	Terrestrial	Yes
	Tern, Interior (population) Leas	st	Sterna antillarum	Endangered	Terrestrial	No
	Dicot					
	Cactus, Knowlton		Pediocactus knowltonii	Endangered	Terrestrial	No
	Cactus, Kuenzler Hedgehog		Echinocereus fendleri var. kuenzleri	Endangered	Terrestrial	No
	Cactus, Lee Pincushion		Coryphantha sneedli var. leei	Threatened	Terrestrial	Νo
	Cactus, Mesa Verde		Scierocactus mesae-verdae	Threatened	Terrestrial	No
	Cactus, Sneed Pincushion		Coryphantha sneedii var. sneedii	Endangered	Terrestrial	No
	Fleabane, Zuni		Erigeron rhizomatus	Threatened	Terrestrial	No
•	Ipomopsis, Holy Ghost		Ipomopsis sancti-spiritus	Endangered	Terrestrial	No
	Milk-vetch, Mancos		Astragalus humillimus	Endangered	Terrestrial	No
	Pennyroyal, Todsen's		Hedeoma todsenii	Endangered	Terrestrial	Yes
	Poppy, Sacramento Prickly	•	Argemone pleiacantha ssp. pinnatisecta	Endangered	Terrestrial	No
	Sunflower, Pecos		Helianthus paradoxus	Threatened	Terrestrial, Freshwater	No
	Thistle, Sacramento Mountains	;	Cirsium vinaceum	Threatened	Terrestrial	No
	Wild-buckwheat, Gypsum		Eriogonum gypsophilum	Threatened	Terrestrial	Yes
	Mammal					
	Bat, Lesser (=Sanborn's) Long-	-nosed	Leptonycteris curasoae yerbabuenae	Endangered	Subterraneous, Terrestrial	No
	Bat, Mexican Long-nosed		Leptonycteris nivalis	Endangered	Subterraneous, Terrestrial	No
	Ferret, Black-footed		Mustela nigripes	Endangered	Terrestrial	No
	Jaguar 🤼		Panthera onca	Endangered	Terrestrial	No
	Reptile				•	
	Rattlesnake, New Mexican Rid	ge-nosed	1 Crotalus willardi obscurus	Threatened	Terrestrial	Yes
	New York Bird	(15)	species:	٠.		<u>CH</u>
	Plover, Piping		Charadrius melodus	Endangered	Terrestrial	Yes
	Tern, Roseate		Sterna dougallii dougallii	Endangered	Terrestrial	No
	Dicot					
	Amaranth, Seabeach		Amaranthus pumilus	Threatened	Coastal (neritic)	No
	Gerardia, Sandplain		Agalinis acuta	Endangered	Terrestrial	No
	Monkshood, Northern Wild		Aconitum noveboracense	Threatened	Terrestrial	No
	Roseroot, Leedy's		Sedum integrifolium ssp. leedyi	Threatened	Terrestrial	No
	Ferns					

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Fern, American hart's-tongue	Asplenium scolopendrium var. americanum	Threatened .	Terrestrial	¹ No
Mammal				
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Monocot				
Pogonia, Small Whorled	Isotria medeoloides	Threatened	Terrestrial	No
Reptile				
Sea turtle, green	Chelonia mydas	Endangered	Saltwater	No
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtle, Kemp's ridley	Lepidochelys kempii	Endangered	Saltwater	No
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater .	Yes
Sea turtle, loggerhead	Caretta caretta	Threatened	Saltwater	No
Turtle, Bog (Northern population)	Clemmys muhlenbergii	Threatened	Terrestrial, Freshwater	No
North Carolina (40)	species:			<u>CH</u>
Bird		-		
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Stork, Wood	Mycteria americana	Endangered	Terrestrial	No
Tern, Roseate	Sterna dougallii dougallii	Endangered	Terrestrial	No
Woodpecker, Red-cockaded	Picoides borealis	Endangered	Terrestrial	No
Dicot		•		
Amaranth, Seabeach	Amaranthus pumilus	Threatened	Coastal (neritic)	No
Avens, Spreading	Geum radiatum	Endangered	Terrestrial	No
Bittercress, Small-anthered	Cardamine micranthera	Endangered	Terrestrial	No
Błazing Star, Heller's	Liatris helleri	Threatened	Terrestrial	No
Bluet, Roan Mountain	Hedyotis purpurea var. montana	Endangered	Terrestrial	No
Chaffseed, American	Schwalbea americana	Endangered	Terrestrial	No
Coneflower, Smooth	Echinacea laevigata	Endangered	Terrestria!	Ν̈́ο
Dropwort, Canby's	Oxypolis canbyi	Endangered	Terrestrial, Freshwater	No
Goldenrod, Blue Ridge	Solidago spithamaea	Threatened	Terrestrial	No
Harperella	Ptilimnium nodosum	Endangered	Freshwater	No
Heartleaf, Dwarf-flowered	Hexastylis naniflora	Threatened	Terrestrial	No
Heather, Mountain Golden	Hudsonia montana	Threatened	Terrestrial	Yes
Joint-vetch, Sensitive	Aeschynomene virginica	Threatened	Terrestrial, Brackish	No
Loosestrife, Rough-leaved	Lysimachia asperulaefolia	Endangered	Terrestrial	No
Meadowrue, Cooley's	Thalictrum cooleyi	Endangered	Terrestrial	No
Pitcher-plant, Green	Sarracenia oreophila	Endangered	Terrestrial, Freshwater	No
		F		
Pitcher-plant, Mountain Sweet	Sarracenia rubra ssp. jonesii	Endangered	Freshwater, Terrestrial	No

Pondberry	Lindera melissifolia	Endangered	Terrestrial	No
Spiraea, Virginia	Spiraea virginiana	Threatened	Terrestrial	No
Sumac, Michaux's	Rhus michauxii	Endangered	Terrestriai	No
Sunflower, Schweinitz's	Helianthus schweinitzii	Endangered	Terrestrial	Νo
Lichen				
Lichen, Rock Gnome	Gymnoderma lineare	Endangered	Terrestria!	No
Mammal				
Bat, Gray	Myotis grisescens	Endangered	Subterraneous, Terrestrial	No
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Bat, Virginia Big-eared	Corynorhinus (=Plecotus) townsendii virginianus	Endangered	Terrestrial, Subterraneous	Yes
Squirrel, Carolina Northern Flying	Glaucomys sabrinus coloratus	Endangered	Terrestrial	No
Monocot		ė	•	
Arrowhead, Bunched	Sagittaria fasciculata	Endangered	Freshwater	No '
Irisette, White	Sisyrinchium dichotomum	Endangered	Terrestrial	No
Pink, Swamp	Helonias bullata	Threatened	Terrestrial, Freshwater	No
Pogonia, Small Whorled	Isotria medeoloides	Threatened	Terrestrial	No
Sedge, Golden	Carex lutea	Endangered	Terrestrial	No
Reptile				
Sea turtle, green	Chelonia mydas	Endangered	Saltwater	No
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtle, Kemp's ridley	Lepidochelys kempii	Endangered	Saltwater	No
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
Sea turtie, loggerhead	Caretta caretta	Threatened	Saltwater	No
North Dakota (4) sp Bird	pecies:		·	<u>CH</u>
Crane, Whooping	Grus americana	Endangered-	Terrestrial, Freshwater	Yes
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Tern, Interior (population) Least Monocot	Sterna antillarum	Endangered	Terrestrial	No
Orchid, Western Prairie Fringed	Platanthera praeclara	Threatened	Terrestrial	No
Ohio (11):	species:			<u>СН</u>
Bird				_
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Dicot		, -		
Clover, Running Buffalo	Trifolium stoloniferum	Endangered	Terrestrial	No

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Daisy, Lakeside	Hymenoxys herbacea	Threatened	Freshwater	No
Monkshood, Northern Wild	Aconitum noveboracense	Threatened	Terrestrial	No
Spiraea, Virginia	Spiraea virginiana	Threatened	Terrestrial	No
Mammal				
Bat, Gray	Myotis grisescens	Endangered	Subterraneous, Terrestrial	No
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Monocot				
Orchid, Eastern Prairie Fringed	Platanthera leucophaea	Threatened	Terrestrial	No
Pogonia, Small Whorled	Isatria medeoloides	Threatened	Terrestrial	No
Reptile				
Sпаke, Lake Erie Water	Nerodia sipedon insularum	Threatened	Terrestrial, Freshwater	No
Snake, Northern Copperbelly W	ater Nerodia erythrogaster neglecta	Threatened	Freshwater, Terrestrial	No
Oklahoma	(11) species:			<u>CH</u>
Bird	· / ·		•	_
Crane, Whooping	Grus americana	Endangered	Terrestrial, Freshwater	Yes
Curlew, Eskimo	Numenius borealis	Endangered	Terrestrial	No
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Tern, Interior (population) Least	Sterna antillarum	Endangered	Terrestrial	No
Vireo, Black-capped	Vireo atricapilla	Endangered	Terrestrial	No
Woodpecker, Red-cockaded	Picoldes borealis	Endangered	Terrestrial	No
Mammal	· , •			
Bat, Gray	Myotis grisescens	Endangered	Subterraneous, Terrestrial	No
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Bat, Ozark Big-eared	Corynorhinus (=Plecotus) townsendii ingens	Endangered	Terrestrial, Subterraneo	us No
Monocot				
Orchid, Eastern Prairie Fringed	Platanthera leucophaea	Threatened	Terrestrial	No
Orchid, Western Prairie Fringed	Platanthera praeclara	Threatened	Terrestrial	No
Oregon	(21) species:			<u>CH</u>
Bird				
Murrelet, Marbled	Brachyramphus marmoratus marmoratus	Threatened	Freshwater, Terrestrial, Saitwater	Yes
Owl, Northern Spotted	Strix occidentalis caurina	Threatened	Terrestrial	Yes
Plover, Western Snowy	Charadrius alexandrinus nivosus	Threatened	Terrestrial	Yes
Dicot				
Catchfly, Spalding's	Silene spaldingii	Threatened	Terrestrial	No
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	Checker-mallow, Nelson's	Sidalcea nelsoniana	Threatened	Terrestrial	No
	Daisy, Willamette	Erigeron decumbens var. decumbens	Endangered	Terrestrial	No
	Four-o'clock, Macfarlane's	Mirabilis macfarlanei	Threatened	Terrestrial	No
	Lomatium, Bradshaw's	Lomatium bradshawii	Endangered	Terrestrial, Freshwater	No
:	Lomatium, Cook's	Lomatium cookii	Endangered	Vernal pool	No
	Lupine, Kîncaid's	Lupinus sulphureus (=oreganus) ssp. kincaidii (=var. kincaidii)	Threatened	Terrestrial	No
	Meadowfoam, Large-flowered Woolly	Limnanthes floccosa ssp.	Endangered	Vernal pool	No
	Milk-vetch, Applegate's	Astragalus applegatei	Endangered	Terrestrial	No ·
	Popcornflower, Rough	Plagiobothrys hirtus	Endangered	Vernal pool	No
	Thelypody, Howell's Spectacular	Thelypodium howellii spectabilis	Threatened	Terrestrial	No
	Wire-lettuce, Malheur	Stephanomeria malheurensis	Endangered	Terrestrial	Yes
	Mammal				
	Deer, Columbian White-tailed	Odocoileus virginianus leucurus	Endangered	Terrestrial ¹	No
•	Monocot				
	Fritillary, Gentner's	Fritillaria gentneri	Endangered	Terrestrial	Ņо
	Lily, Western	Lilium occidentale	Endangered	Terrestrial	No
	Reptile				
	Sea turtle, green	Chelonia mydas	Endangered	Saltwater	No
	Sea turtle, featherback	Dermochelys coriacea	Endangered	Saltwater	Yes
	Sea turtle, loggerhead	Caretta caretta	Threatened	Saltwater	No
	Pennsylvania (6) s	pecies:			<u>CH</u>
	Bird		-		-
	Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
	Mammal				
	Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
	Squirrel, Delmarva Peninsula Fox	Sciurus niger cinereus	Endangered	Terrestrial	No
	Monocot			·	
	Bulrush, Northeastern (=Barbed Bristle)	Scirpus ancistrochaetus	Endangered	Terrestrial, Freshwater	No
	Pogonia, Small Whorled	Isotria medeoloides	Threatened	Terrestrial	No
	Reptile		-		
	Turtle, Bog (Northern population)	Clemmys muhlenbergii	Threatened	Terrestrial, Freshwater	No
	Puerto Rico (69)	species:			<u>CH</u>
	Amphibian	,			
	Coqui, Golden	Eleutherodactylus jasperi	Threatened	Freshwater, Terrestrial	Yes
	Guajon	Eleutherodactylus cooki	Threatened	Freshwater, Terrestrial	No
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Toad, Puerto Rican Crested Bird	Peltophryne lemur	Threatened	Terrestrial, Freshwater	No
Blackbird, Yellow-shouldered	Agelaius xanthomus	Endangered	Terrestrial	Yes
Hawk, Puerto Rican Broad-winged	Buteo platypterus brunnescens	Endangered	Terrestrial	No
Hawk, Puerto Rican Sharp-shinned	Accipiter striatus venator	Endangered	Terrestrial	No
Nightjar, Puerto Rico	Caprimulgus noctitherus	Endangered	Terrestrial	No
Parrot, Puerto Rican	Amazona vittata	Endangered	Terrestrial	No
Pigeon, Puerto Rican Plain	Columba inornata wetmorei	Endangered	Terrestrial	No
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Tern, Roseate	Sterna dougallii dougallii	Endangered	Terrestrial	Nο
Dicot		•		
Auerodendron pauciflorum (ncn)	Auerodendron pauciflorum	Endangered	Terrestrial	No
Baríaco	Trichilla triacantha	Endangered	Terrestrial	No
Boxwood, Vahl's	Buxus vahlii	Endangered	Terrestrial	No
Calyptranthes Thomasiana (ncn)	Calyptranthes thomasiana	Endangered	Terrestrial	No
Capa Rosa	Callicarpa ampla	Endangered	Terrestrial	No
Catesbaea Melanocarpa (ncn)	Catesbaea melanocarpa	Endangered	Terrestrial	No
Chamaecrista glandulosa (non)	Chamaecrista glandulosa var. mirabilis.	Endangered	Terrestrial	No
Chumbo, Higo	Harrisia portoricensis	Threatened	Terrestrial	No
Chupacallos	Pleodendron macranthum	Endangered	Terrestrial	No
Cobana Negra	Stahlia monosperma	Threatened	Terrestrial	No
Cordia bellonis (non)	Cordia bellonis	Endangered	Terrestria!	No
Daphnopsis hellerana (ncn)	Daphnopsis hellerana	Endangered	Terrestrial	No
Erubia	Solanum drymophilum	Endangered	Terrestrial	No
Eugenia Woodburyana	Eugenia woodburyana	Endangered	Terrestrial	No
Gesneria pauciflora (ncn)	Gesneria pauciflora	Threatened	Terrestrial	No
Goetzea, Beautiful (Matabuey)	Goetzea elegans	Endangered	Terrestrial	No
Higuero De Sierra	Crescentia portoricensis	Endangered	Terrestrial	No
Holfy, Cook's	llex cookii	Endangered	Terrestrial	No
Ilex sintenisii (ncn)	Ilex sintenisii	Endangered	Terrestrial	No
Leptocereus grantianus (ncn)	Leptocereus grantianus	Endangered	Terrestrial	No
Lyonia truncata var. proctorii (ncn)	Lyonia truncata var. proctorii	Endangered	Terrestrial	No
Mitracarpus Maxwelliae	Mitracarpus maxwelliae	Endangered	Terrestrial	No
Mitracarpus Polycladus	Mitracarpus polycladus	Endangered	Terrestrial	No
Myrcia Paganii	Myrcia paganii	Endangered	Terrestrial	No
Palo Colorado (Ternstroemia luquillensis)	Temstroemia luquillensis	Endangered	Terrestrial	No

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Palo de Jazmin	Styrax portoricensis	Endangered	Terrestria!	No
Palo de Nigua	Comutia obovata	Endangered	Terrestrial	No
Palo de Ramon	Banara vanderbiltii	Endangered	Terrestrial	No
Palo de Rosa	Ottoschulzia rhodoxylon	Endangered	Terrestrial	No
Peperomia, Wheeler's	Peperomia wheeleri	Endangered	Terrestrial	No
Prickly-ash, St. Thomas	Zanthoxylum thomasianum	Endangered	Terrestriał	No
Schoepfia arenaria (ncn)	Schoepfia arenaria	Threatened	Terrestrial	No
Ternstroemia subsessilis (ncn)	Ternstroemia subsessilis	Endangered	Terrestrial	No
Uvillo	Eugenia haematocarpa	Endangered	Terrestrial	No
Vernonia Proctorii (лсл)	Vernonia proctorii	Endangered	Terrestrial	No
Walnut, Nogal	Juglans jamaicensis	Endangered	Terrestrial	No
Ferns				
Fern, Adiantum vivesii	Adiantum vivesii	Endangered	Terrestrial	No
Fern, Elaphoglossum serpens	Elaphoglossum serpens	Endangered	Terrestrial	No
Fern, Thelypteris inabonensis	Thelypteris inabonensis	Endangered	Terrestrial	No
Fern, Thelypteris verecunda	Thelypteris verecunda	Endangered	Terrestrial	No
Fern, Thelypteris yaucoensis	Thelypteris yaucoensis	Endangered	Terrestrial	No
Polystichum calderonense (ncn)	Polystichum calderonense	Endangered	Terrestrial	No
Tectaria Estremerana	Tectaria estremerana	Endangered	Terrestrial	No
Tree Fern, Elfin	Cyathea dryopteroides	Endangered	Terrestrial	No
Monocot				
Aristida chaseae (ncn)	Aristida chaseae	Endangered	Terrestrial	No
Cranichis Ricartii	Cranichis ricartii	Endangered	Terrestrial	No
Lepanthes eltorensis (non)	Lepanthes eltoroensis	Endangered	Terrestrial	No
Manaca, palma de	Calyptronoma rivalis	Threatened	Terrestrial	Νο
Pelos del Diablo	Aristida portoricensis	Endangered	Terrestrial	No
Reptile	<i>;</i>			
Anole, Culebra Island Glant	Anolis roosevelti	Endangered	Terrestrial	Yes
Boa, Mona	Epicrates monensis monensis	Threatened	Terrestrial	Yes
Boa, Puerto Rican	Epicrates inornatus	Endangered	Terrestrial	. No
Gecko, Monito	Sphaerodactylus micropithecus	Endangered	Terrestrial	Yes
Iguana, Mona Ground	Cyclura stejnegeri	Threatened	Terrestrial	Yes
Sea turtle, green	Chelonia mydas	Endangered	Saltwater	No
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
Sea turtie, loggerhead	Caretta caretta	Threatened	Saltwater	No
Rhode Island (8)	species:			<u>CH</u>

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Bird	ı			
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Dicot				
Gerardia, Sandplain	Agalinis acuta	Endangered	Terrestrial	No
Mammal				
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Monocot			renesula)	
Pogonia, Small Whorled	Isotria medeoloides	Threatened	Terrestrial	No
Reptile		,		
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtle, Kemp's ridley	Lepidochelys kempii	Endangered	Saltwater	No
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
Sea turtle, loggerhead	Caretta caretta	Threatened	Saltwater	No
South Carolina	(32) species:		•	<u>CH</u>
Amphibian	(52) 565555			<u> </u>
Salamander, Flatwoods	Ambystoma cingulatum	Threatened	Freshwater, Vernal pool, Terrestriai	Nο
Bird	•			
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Stork, Wood	Mycteria americana	Endangered	Terrestrial	No
Warbler, Bachman's	Vermivora bachmanii	Endangered	Terrestrial	No
Woodpecker, Red-cockaded	Picoides borealis	Endangered	Terrestrial	No
Dicot				
Amaranth, Seabeach	Amaranthus pumilus	Threatened ^S	Coastal (neritic)	Nο
Amphianthus, Little	Amphianthus pusillus	Threatened	Freshwater	No
Chaffseed, American	Schwalbea americana	Endangered	Terrestrial	No
Coneflower, Smooth	Echinacea laevigata	Endangered	Terrestrial	No
Dropwort, Canby's	Oxypolis canbyi	Endangered	Terrestrial, Freshwater	No
Gooseberry, Miccosukee	Ribes echinellum	Threatened	Terrestrial	No
Harperella	Ptilimnium nodosum	Endangered	Freshwater	No
Heartleaf, Dwarf-flowered	Hexastylis naniflora	Threatened	Terrestrial	No
Loosestrife, Rough-leaved	Lysimachia asperulaefolia	Endangered	Terrestrial	No
Pitcher-plant, Mountain Sweet	Sarracenia rubra ssp. jonesii	Endangered	Freshwater, Terrestrial	No
Pondberry	Lindera melissifolia	Endangered	Terrestrial	No
Sunflower, Schweinitz's	Helianthus schweinitzii	Endangered	Terrestrial	Νo
Ferns				
Quillwort, Black-spored	Isoetes melanospora	Endangered	Vernal pool	No
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		(
Lichen	·			
Lichen, Rock Gnome	Gymnoderma lineare	Endangered	Terrestrial	No
' Mammal				
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Monocot				
Arrowhead, Bunched	Sagittaria fasciculata	Endangered	Freshwater	No
Irisette, White	Sisyrinchium dichotomum	Endangered	Terrestrial	No
Pink, Swamp	Helonias bullata	Threatened	Terrestrial, Freshwater	No
Pogonia, Small Whorled	Isotria medeoloides	Threatened	Terrestrial	No
Trillium, Persistent	Trillium persistens	Endangered	Terrestrial	Nο
Trillium, Relict	Trillium reliquum	Endangered	Terrestrial	No
Reptile				
Sea turtle, green	Chelonia mydas	Endangered	Saltwater	No
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtle, Kemp's ridley	Lepidochelys kempii	Endangered	Saltwater	Νo
Sea turtle, featherback	Dermochelys coriacea	Endangered	Saltwater	Yes
Sea turtle, loggerhead	Caretta caretta	Threatened	Saltwater	No
Snake, Eastern Indigo	Drymarchon corais couperi	Threatened	Terrestrial	No
South Dakota	(5) species:	*		<u>CH</u>
Bird				
Crane, Whooping	Grus americana	Endangered	Terrestrial, Freshwater	Yes
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Tern, Interior (population) Least Mammal	Sterna antillarum	Endangered	Terrestrial	No
Ferret, Black-footed Monocot	Mustela nigripes	Endangered	Terrestrial	No
Orchid, Western Prairie Fringed	Platanthera praeclara	Threatened	Terrestrial	No
<i>Tennessee</i> Bird	(27) species:			<u>CH</u>
Stork, Wood	Mycteria americana	Endangered	Terrestrial	No
Tem, Interior (population) Least	Stema antillarum	Endangered	Terrestrial	No
Woodpecker, Red-cockaded Dicot	Picoides borealis	Endangered	Terrestrial	No
Aster, Ruth's Golden	Pityopsis ruthii	- Endangered	Terrestrial	No
Avens, Spreading	Geum radiatum	Endangered	Terrestrial	No
Bladderpod, Spring Creek	Lesquerella perforata	Endangered	Floodplain	No
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Bluet, Roan Mountain	Hedyotis purpurea var. montana	Endangered	Terrestrial	No
Chaffseed, American	Schwalbea americana	Endangered	Terrestrial	No
Clover, Leafy Prairie	Dalea toliosa	Endangered	Terrestrial	No
Coneflower, Tennessee Purple	Echinacea tennesseensis	Endangered	Terrestria!	No
Goldenrod, Blue Ridge	Solidago spithamaea	Threatened	Terrestrial	No
Ground-plum, Guthrie's	Astragalus bibullatus	Endangered	Terrestrial	Nο
Pitcher-plant, Green	Sarracenia oreophila	Endangered	Terrestrial, Freshwater	No
Potato-bean, Price's	Apios priceana	Threatened	Terrestrial	No
Rock-cress, Large (=Braun's)	Arabis perstellata E. L. Braun var, ampla Rollins	Endangered	Terrestrial	Yes
Rock-cress, Small	Arabis perstellata E. L. Braun var. perstellata Fernald	Endangered	Terrestrial	Yes
Rosemary, Cumberland	Conradina verticillata	Threatened	Terrestrial	No
Sandwort, Cumberland	Arenaria cumberlandensis	Endangered	Terrestrial	No
Skullcap, Large-flowered	Scutellaria montana	Threatened	Terrestrial	No
Spiraea, Virginia Ferns	Spiraea virginiana	Threatened	Terrestriai	No
Fern, American hart's-tongue	Asplenium scolopendrium var- americanum	Threatened	Terrestrial	Νo
Lichen				
Lichen, Rock Gnome Mammal	Gymnoderma lineare	Endangered	Terrestrial	No
Bat, Gray	Myotis grisescens	Endangered	Subterraneous, Terrestrial	No
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Squirrel, Carolina Northern Flying MONOCOT	Glaucomys sabrinus coloratus	Endangered	Terrestrial	No
Grass, Tennessee Yellow-eyed	Xyris tennesseensis	Endangered	Terrestrial	No
Pogonia, Small Whorled	Isotria medeoloides	Threatened	Terrestrial	No
Texas (5	6) species:			<u>CH</u>
Amphibian	•			
Salamander, Barton Springs	Eurycea sosorum	Endangered	Freshwater, Terrestrial	No
Salamander, San Marcos	Eurycea nana	Threatened	Freshwater, Terrestrial	Yes
Salamander, Texas Blind	Typhlomolge rathbuni	Endangered	Subterraneous, Freshwater	No
Toad, Houston	Bufo houstonensis	Endangered	Terrestrial, Freshwater	Yes
Bird				
Crane, Whooping	Grus americana	Endangered	Terrestrial, Freshwater	Yes
Curlew, Eskimo	Numenius borealis	Endangered	Terrestrial	No
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Falcon, Northern Aplomado	Falco femoralis septentrionalis	Endangered	Terrestrial	No
Flycatcher, Southwestern Willow	Empidonax traillii extimus	Endangered	Terrestrial	Yes
Owl, Mexican Spotted	Strix occidentalis lucida	Threatened	Terrestrial	Yes
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Prairie-chicken, Attwater's Greater	Tympanuchus cupido attwateri	Endangered	Terrestrial	No
Tern, Interior (population) Least	Sterna antillarum	Endangered	Terrestrial	No
Vireo, Black-capped	Vireo atricapilla	Endangered	Terrestrial	No
Warbler (⊭Wood), Golden-cheeked	Dendroica chrysoparia	Endangered	Terrestrial	No
Woodpecker, Red-cockaded	Picoides borealis	Endangered	Terrestrial	No
Dicot				
Ambrosia, South Texas	Ambrosia cheiranthifolia	Endangered	Terrestrial	No
Ayenia, Texas	Ayenia limitaris	Endangered	Terrestrial	No
Bladderpod, White	Lesquerella pallida	Endangered	Terrestrial	No
Bladderpod, Zapata	Lesquerella thamnophila	Endangered	Terrestrial	Yes
Cactus, Black Lace	Echinocereus reichenbachii var. albertii	Endangered	Terrestrial	No
Cactus, Bunched Cory	Coryphantha ramillosa	Threatened	Terrestrial	No
Cactus, Chisos Mountain Hedgehog	Echinocereus chisoensis var. chisoensis	Threatened	Terrestrial	No
Cactus, Lloyd's Mariposa	Echinomastus mariposensis	Threatened	Terrestrial	No
Cactus, Nellie Cory	Coryphantha minima	Endangered	Terrestrial	No
Cactus, Sneed Pincushion	Coryphantha sneedii var. sneedii	Endangered	Terrestrial	No
Cactus, Star	Astrophytum asterias	Endangered	Terrestrial	No
Cactus, Tobusch Fishhook	Ancistrocactus tobuschii	Endangered	Terrestrial	No
Cat's-eye, Terlingua Creek	Cryptantha crassipes	Endangered	Terrestrial	No
Dawn-flower, Texas Prairie (=Texas Bitterweed)	Hymenoxys texana	Endangered	Terrestrial	No
Dogweed, Ashy	Thymophylla tephroleuca	Endangered	Terrestrial	No
Frankenia, Johnston's	Frankenia johnstonii	Endangered	Terrestrial	No
Fruit, Earth (=geocarpon)	Geocarpon minimum	Threatened	Terrestrial	No
Manioc, Walker's	Manihot walkerae	Endangered	Terrestrial	No
Oak, Hinckley	Quercus hinckleyi	Threatened	Terrestrial	No
Phlox, Texas Trailing	Phlox nivalis ssp. texensis	Endangered :	Terrestrial	No
Pitaya, Davis' Green	Echinocereus viridiflorus var. davisli	Endangered	Terrestrial	No
Poppy-mallow, Texas	Callirhoe scabriuscula	Endangered	Terrestrial	No
Rush-pea, Siender	Hoffmannseggia tenella	Endangered	Terrestrial	No
Sand-verbena, Large-fruited	Abronia macrocarpa	Endangered	Terrestrial	No
Snowbells, Texas	Styrax texanus	Endangered	Terrestrial	No

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Sunflower, Pecos	Helianthus paradoxus	Threatened	Terrestrial, Freshwate	er No
Wild-buckwheat, Gypsum	Eriogonum gypsophilum	Threatened	Terrestrial	Yes
Mammal				
Bat, Mexican Long-nosed	Leptonycteris nivalis	Endangered	Subterraneous, Terrestrial	No
Bear, Louisiana Black	Ursus americanus luteolus	Threatened	Terrestrial	No
Jaguarundi, Gulf Coast	Herpailurus (=Felis) yagouaroundi cacomitli	Endangered	Terrestrial	No
Jaguarundi, Sinaloan	Herpailurus (=Felis) yagouaroundi tolteca	Endangered	Terrestrial	No
Ocelot	Leopardus (=Felis) pardalis	Endangered	Terrestrial	No
Monocot				
Ladies'-tresses, Navasota	Spiranthes parksii	Endangered	Terrestrial	No
Pondweed, Little Aguja Creek	Potamogeton clystocarpus	Endangered	Freshwater	No
Wild-rice, Texas	Zizania texana	Endangered	Freshwater	Yes
Reptile				
Sea turtle, green	Chelonia mydas	Endangered	Saltwater	No
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered -	Saltwater	Yes
Sea turtle, Kemp's ridley	Lepidochelys kempii	Endangered	Saltwater	No
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saitwater	Yes
Sea turtle, loggerhead	Caretta caretta	Threatened	Saltwater	No
Snake, Concho Water	Nerodia paucimaculata	Threatened	Freshwater, Terrestria	al Yes
Utah (29)	species:		•	<u>СН</u>
Bird	•	=		_
Flycatcher, Southwestern Willow	Empidonax traillii extimus	Endangered	Terrestrial	Yes
Owl, Mexican Spotted	Strix occidentalis lucida	Threatened	Terrestrial	Yes
Dicot			•	
Bear-poppy, Dwarf	Arctomecon humilis	Endangered	Terrestrial	No
Bladderpod, Kodachrome	Lesquerella tumulosa	Endangered	Terrestrial	No
Buttercup, Autumn	Ranunculus aestivalis (=acriformis)	Endangered	Terrestrial	No
Cactus, San Rafael	Pediocactus despainii	Endangered	Terrestrial	No
Cactus, Siler Pincushion	Pediocactus (=Echinocactus,=Utahia) sileri	Threatened	Terrestrial	No
Cactus, Uinta Basin Hookless	Sclerocactus glaucus	Threatened	Terrestria!	No.
Cactus, Winkler	Pediocactus winkleri	Threatened	Terrestrial	No
Cactus, Wright Fishhook	Sclerocactus wrightiae	Endangered	Terrestrial	No
Cycladenia, Jones	Cycladenia jonesii (=humilis)	Threatened	Terrestrial	No
Daisy, Maguire	Erigeron maguirei	Threatened	Freshwater	No
Milk-vetch, Deseret	Astragalus desereticus	Threatened	Terrestrial	No
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Milk-vetch, Heliotrope	Astragalus montii	Threatened	Terrestrial	Yes
Milk-vetch, Holmgren	Astragalus holmgreniorum	Endangered	Terrestrial	No
Milk-vetch, Shivwits	Astragalus ampullarioides	Endangered	Terrestrial	No
Milkweed, Welsh's	Asclepias welshii	Threatened	Terrestrial	Yes
Phacelia, Clay	Phacelia argillacea	Endangered	Terrestrial	No
Primrose, Maguire	Primula maguirei	Threatened	Terrestrial	No
Reed-mustard, Barneby	Schoenocrambe barnebyi	Endangered	Terrestrial	No
Reed-mustard, Clay	Schoenocrambe argillacea	Threatened	Terrestrial	No
Reed-mustard, Shrubby	Schoenocrambe suffrutescens	Endangered	Terrestrial	No
Ridge-cress (=Pepper-cress),	Lepidium barnebyanum	Endangered	Terrestrial	No
Townsendia, Last Chance	Townsendia aprica	Threatened	Terrestrial	No
Mammal				
Ferret, Black-footed	Mustela nigripes	Endangered	Terrestrial	No
Prairie Dog, Utah	Cynomys parvidens	Threatened	Terrestrial, Subterraneo	⊔s No
Monaget	·.			
Monocot	O in the state of the inte	The second	T4/1	*1
Ladies'-tresses, Ute	Spiranthes diluvialis	Threatened	Terrestrial	No
Sedge, Navajo	Carex specuicola	Threatened	Terrestrial	Yes
Reptile		· ·		
Tortoise, Desert	Gopherus agassizii	Threatened	Terrestrial	Yes
Vermont	(3) species:			<u>СН</u>
Dicot				
Milk-vetch, Jesup's	Astragalus robbinsii var. jesupi	Endangered	Terrestrial	No
Mammal	St.			
Bat, Indiana	Myotis sodalis	Endangered .	Subterraneous, Terrestria!	Yes
Monocot			•	
Bulrush, Northeastern (=Barbed Bristle)	Scirpus ancistrochaetus	Endangered	Terrestrial, Freshwater	No
Virginia	(29) species:			СН
Amphibian	(20) 36 30 30		÷	. <u>,</u>
Salamander, Shenandoah	Plethodon shenandoah	Endangered	Freshwater, Terrestrial	No
Bird			,	
Plover, Pîping	Charadrius melodus	Endangered	Terrestrial	Yes
Woodpecker, Red-cockaded	Picoides borealis	Endangered	Terrestrial	No
Dicot	•			
Amaranth, Seabeach	Amaranthus pumilus	Threatened	Coastal (neritic)	No
Birch, Virginia Round-leaf	Betula uber	Threatened	Floodplain	No
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Bittercress, Small-anthered	Cardamine micranthera	Endangered	Terrestrial	No
Chaffseed, American	Schwalbea americana	Endangered	Terrestrial	No
Coneflower, Smooth	Echinacea laevigata	Endangered	Terrestrial .	No
Harperelia	Ptilimnjum nodosum	Endangered	Freshwater	No
Joint-vetch, Sensitive	Aeschynomene virginica	Threatened	Terrestrial, Brackish	No
Mallow, Peter's Mountain	Iliamna corei	Endangered	Terrestrial	No
Rock-cress, Shale Barren	Arabis serotina	Endangered	Terrestrial	No
Sneezeweed, Virginia	Helenium virginicum	Threatened	Vernal pool	No
Spiraea, Virginia	Spiraea virginiana .	Threatened	Terrestrial	No
Sumac, Michaux's	Rhus michauxii	Endangered	Terrestrial	No
Sunflower, Schweinitz's	Helianthus schweinitzii	Endangered	Terrestrial	No
Mammal				
Bat, Gray	Myotis grisescens	Endangered	Subterraneous, Terrestrial	Ño
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Bat, Virginia Big-eared	Corynorhinus (=Plecotus) townsendii virginianus	Endangered	Terrestrial, Subterraneous	Yes
Squirrel, Delmarva Peninsula Fox	Sciurus niger cinereus	Endangered	Terrestrial	No
Monocot				
Bulrush, Northeastern (=Barbed Bristle)	Scirpuş ancistrochaetus	Endangered	Terrestrial, Freshwater	No
Orchid, Eastern Prairie Fringed	Platanthera leucophaea	Threatened	Terrestrial	No
Pink, Swamp	Helonias bullata	Threatened	Terrestrial, Freshwater	No
Pogonia, Small Whorled	Isotria medeoloides	Threatened	Terrestria!	No
Reptile			•	
Sea turtle, green	Chelonia mydas	Endangered	Saltwater	No
Sea turtle, hawksbill	Eretmochelys imbricata	Endangered	Saltwater	Yes
Sea turtie, Kemp's ridley	Lepidochelys kempii	Endangered	Saltwater	No
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
Sea turtle, loggerhead	Caretta ·	Threatened	Saltwater	No
Washington (16) Bird	species:			<u>СН</u>
Murrelet, Marbled	Brachyramphus marmoratus marmoratus	Threatened	Freshwater, Terrestrial, Saltwater	Yes
Owl, Northern Spotted	Strix occidentalis caurina	Threatened	Terrestrial	Yes
Plover, Western Snowy Dicot	Charadrius alexandrinus nivosus	Threatened	Terrestrial	Yes
Catchfly, Spalding's	Silene spaldingii	Threatened	Terrestrial	No

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Checker-mailow, Nelson's	Sidalcea nelsoniana	Threatened	Terrestrial	No
Checker-mailow, Wenatchee Mountain	ns Sidalcea oregana var, calva	Endangered	Terrestrial	Yes
Howellia, Water	Howellia aquatilis	Threatened	Freshwater	No
Lupine, Kincaid's	Lupinus sulphureus (=oreganus) ssp. kincaidii (=var. kincaidii)	Threatened	Terrestrial	No
Paintbrush, Golden	Castilleja levisecta	Threatened	Terrestrial	No
Stickseed, Showy	Hackelia venusta	Endangered	Terrestrial	Nο
Mammal				
Bear, Grizzly	Ursus arctos horribilis	Threatened	Terrestrial	No
Caribou, Woodland	Rangifer tarandus caribou	Endangered	Terrestrial	No
Deer, Columbian White-tailed	Odocoileus virginianus leucurus	Ел dangered	Terrestrial	No
Rabbit, Pygmy	Brachylagus idahoensis	Endangered	Terrestrial	No
Reptile				
Sea turtle, green	Chelonia mydas	Endangered	Saltwater	Nο
Sea turtle, leatherback	Dermochelys coriacea	Endangered	Saltwater	Yes
West Virginia (10) Amphibian	species:			<u>CH</u>
Salamander, Cheat Mountain Dicot	Plethodon nettingi	Threatened	Freshwater, Terrestrial	No
Clover, Running Buffalo	Trifolium stoloniferum	Endangered	Terrestrial	No
Harperella	Ptilimnium nodosum	Endangered	Freshwater	No
Rock-cress, Shale Barren	Arabis serotina	Endangered	Terrestrial	No
Spiraea, Virginia	Spiraea virginiana	Threatened	Terrestrial	No
Mammal	, ,			
Bat, Gray	Myotis grisescens	Endangered	Subterraneous, Terrestrial	No
Bat, Indiana	Myotis sodalis	Endangered	Subterraneous, Terrestrial	Yes
Bat, Virginia Big-eared	Corynorhinus (=Plecotus) townsendii virginianus	Endangered	Terrestrial, Subterraneou	s Yes
Squirrel, Carolina Northern Flying	Glaucomys sabrinus coloratus	Endangered	Terrestrial	Νo
Monocot				
Bulrush, Northeastern (=Barbed Bristle)	Scirpus ancistrochaetus	Endangered	Terrestrial, Freshwater	No
Wisconsin . (10)	species:			<u>CH</u>
Bird				
Crane, Whooping	Grus americana	Endangered	Terrestrial, Freshwater	Yes
Plover, Piping	Charadrius melodus	Endangered	Terrestrial	Yes
Warbler (=Wood), Kirtland's	Dendroica kirtlandii	Endangered	Terrestrial	No
4/29/2010 12:24:50 PM Ver. 2.10.4			Page 4	49 of 50

Dicot

2.00.				
Clover, Prairie Bush	Lespedeza leptostachya	Threatened	Terrestrial	No
Locoweed, Fassett's	Oxytropis campestris var.	Threatened	Terrestrial	No
Monkshood, Northern Wild	Aconitum noveboracense	Threatened	Terrestrial	No
Thistle, Pitcher's	Cirsium pitcheri	Threatened	Terrestrial	No
Mammal				
Lynx, Canada	Lynx canadensis	Threatened	Terrestrial	No
Monocot				
tris, Dwarf Lake	tris lacustris	Threatened	Terrestrial	No
Orchid, Eastern Prairie Fringed	Platanthera leucophaea	Threatened	Terrestrîa!	No
Wyoming (6):	species;			<u>CH</u>
Amphibian				
Toad, Wyoming	Bufo baxteri (=hemiophrys)	Endangered	Freshwater, Terrestrial	No
Dicot				
Butterfly Plant, Colorado	Gaura neomexicana var. coloradensis	Threatened	Terrestrial	Yes
Yellowhead, Desert	Yermo xanthocephalus	Threatened	Terrestrial	Yes
Mammal				
Bear, Grizzly	. Ursus arctos horribilis	Threatened	Terrestrial *	No
Ferret, Black-footed	Mustela nigripes	Endangered	Terrestrial	No
Mouse, Preble's Meadow Jumping	Zapus hudsonius preblei	Threatened	Terrestrial	Yes

No species were selected for exclusion.

Dispersed species included in report.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

November 13, 2008

Ms. Amy Dugger-Ronyak Regulatory Affairs Specialist SEPRO CORPORATION 11550 North Meridian Street Suite 600 Carmel, IN 46032-4565

Subject: CSF Notification

Dear Ms. Dugger-Ronyak:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 2/27/07 for EPA Registration 67690-16. The Registration Division (RD) has conducted a review of the Confidential Statement of Formula (CSF) submitted with this request for applicability under PRN 98-10 and finds that the change(s) requested falls within the scope of PRN 98-10. Therefore, Alternate #1 CSF dated 7/22/08 is acceptable. A copy of the CSF has been added to the registration file for the subject product.

If you have any questions, please contact me via telephone at 703-308-8893 or e-mail (hobgood.sherada@epa.gov).

Sincerely,

Sherada D. Hobgood

Notifications Review Coordinator

Registration Division (7505P)

Office of Pesticide Programs



SePRO Corporation • 11550 North Meridian Street • Suite 600 • Carmel, Indiana 46032-4565 *Phone:* (317) 580-8282 • *Fax:* (317) 428-4577

July 22, 2008

Minor Formulation Review Coordinator (MFRC)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive.
Arlington, VA 22202-4501

RE: Accelerated Review of a Minor Formulation Change, Pursuant to PR Notice 98-10 Cutless Technical (Alt. Brand Name: Flurprimidol Technical), EPA Reg. No. 67690-16

Dear Ms. Hobgood:

On behalf of SePRO Corporation I am submitting an alternate Confidential Statement of Formula (CSF), Alternate #1, for Cutless Technical (EPA Reg. No. 67690-16). This new CSF qualifies as an accelerated review of a minor formulation amendment pursuant to PR Notice 98-10. Please find enclosed the following information to support this amendment request:

- Application for Pesticide, EPA Form 8570-1;
- Two (2) copies of the proposed Alternate #1 CSF; and
- One (1) copy of the current basic CSF on file with the EPA.

The only change on this new, alternate CSF is to add a new contract manufacturer which is located in the USA. The new manufacturing facility uses the same manufacturing process that has previously been approved by the U.S. Environmental Protection Agency (EPA). The new manufacturer has stated that it will meet the specifications listed on the CSF; therefore, we have submitted this change as a notification.

No label is being submitted as this change does not affect the label text for this technical product.

This notification is consistent with the provisions of the PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 USC Sec. 1001 to willfully make any false statement to the EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions regarding this submission, please contact me at (317) 580-8286 or amyd@sepro.com.

gger-Rongak

Sincerely,

Amy Dugger-Ronyak

Regulatory Affairs Specialist

Enclosures

Please read instructions on reverse before con	nj ng form.	Form Approved	VIB No. 2070-0060	
	United States 1tal Protection Age sshington, DC 20460		Registration Amendment Other	OPP Identifier Number
	Application for	Pesticide - Section	1	
1. Company/Product Number 67690-16		2. EPA Product Manager Tony Kish	r=-	pposed Classification
4. Company/Product (Name) Cutless Technical		PM# 22		None Restricted
5. Name and Address of Applicant (Include 2) SePRO Corporation 11550 N. Meridian Street, Suite 600 Carmel, IN 46032 Chack if this is a new address		6. Expedited Review. (b)(i), my product is simito: EPA Reg. No Product Name	llar or identical in cor	mposition and labeling
	Sec	tion - II		
Amendment - Explain below. Resubmission in response to Agency is Notification - Explain below.	otter dated	Final printed label Agency letter date "Me Too" Applica Other - Explain be	ed tion.	
Explanation: Use additional page(s) if necessary Submission of an alternate formulation (s	†1) as a minor formulatio	n amendment pursuant to	PRN 98-10.	
	Sec	tion - III		
1. Material This Product Will Be Packaged In:				
Child-Resistant Packaging Yes* No * Certification must be submitted Unit Packaging Unit Packaging	No. per If "Ye	Soluble Packaging Yes No s" No. per ge wgt container	2. Type of Container Metal Plastic Glass Paper Other (S	pecify)
			Ĺ <u> </u>	
3. Location of Net Contents Information Label Container	4. Size(s) Retail Conte	iner 5. Lo	cation of Label Direction On Label On Labeling accom	
6. Manner in Which Lebel is Affixed to Produc	t Lithograph Paper glued Stenciled	Other		
	Sec	tion - IV		
1. Contact Point (Complete items directly bei	ow for identification of indi	vidual to be contacted, if nece	assary, to process this	application.)
Name Amy Dugger-Ronyak	Title Regul.	Affairs Specialist	Telephone 317-580-	No. (Include Area Code) -8286
i certify that the statements I have mad I acknowledge that any knowingly false both under applicable law.				6. Date Application Received (Stamped)
2. Signeture My Bryger-Ron	Jan -	ory Affairs Specialist		
4. Typed Nemé (Amy Dugger-Ronyak	July 22	, 2008		212

FOR OFFICIAL USE ONLY

10A-212

FILE SYMBOL

62719-ERE

REGISTRATION NO.

CONFIDENTIAL STATEMENT OF FORMULA ENCLOSED

DATE	SUBMITTED BY (V)			
SUBMITTED	APPLICANT	BASIC SUPPLIER		
4-22-91	/			

Do Not Write Comments,
Formula, or Parts of Formula
on This Envelope

NOTE

It shall be unlawful—for any person to use for his own advantage or to reveal, other than to the Secretary, or officials or employees of the United States Department of Agriculture or other Federal agencies, or to the courts in response to a subpoena, or to physicians, and in emergencies to pharamacists and other qualified persons, for use in the preparation of antidotes, in accordance with such directions as the Secretary may prescribe, any information relative to formulas of products acquired by authority of Section 4 of the "Federal Insecticide, Fungicide, and Rodenticide Act."



